

EXHIBIT A

Compiled Log of Documents Challenged by Ms. Nupson in Motion to Compel v. Blank Rome¹

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
BHICOZ 003748	2003/02/03 to 02/04 Email chain beginning between Michael Gunter, Esq. (counsel for Lucia Hughes) and Larry Laubach, Esq., et al. and ending with redacted email as described in next column.	Body of last email at the top of first page, re email exchange with Mr. Gunter, from Larry Laubach, Esq., to John S. Middleton and Scott Barbakoff, Esq., redacted as attorney-client privileged. Messrs. Laubach and Barbakoff represented Bradford and John individually and in his capacities as officer of Bradford, trustee of the 1994 Anna Trusts, and trustee and beneficiary of the original 2001 GRAT	Bradford, John individually and John as Trustee of, <i>inter alia</i> , 1994 Anna Trusts for which Ms. Nupson was a beneficiary at the time of the notes' creation.	Yes - relates to 2002/2003 negotiations of Family Settlement Agreement re the 1994 Anna Trust	N/A	None

¹Column A provides either the starting Bates number for documents that were produced in redacted form, or the entry number for documents that were withheld in their entirety and listed on the privilege logs in the Orphans’ Court Litigation. Column B describes either (1) a document that was produced in redacted form or (2) a document that was withheld in its entirety. Column C identifies the privilege invoked; for redacted documents, it also provides a more specific description of the information that was redacted. Column D identifies the person(s) who hold any privilege or other protection and – where applicable – in what capacity. Column E states whether the document or redacted portion thereof relates to the 1994 Anna Trust, the Modified 2001 GRAT or the 2001 Anna GRAT. Column F provides any additional notes necessary to explain what has been redacted or withheld. Column G identifies the Subpoena Request, if any, to which the redacted information or withheld document is responsive, subject to the assumption – which Blank Rome objects to – that Ms. Nupson is permitted to seek documents that do not appear on the Attachment to the Subpoena.

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
BHICOZ 005093	2003/03/20 – Memorandum from John S. Middleton to Elizabeth Arias, Esq., (counsel for Ms. Hughes) and Bruce Rosenfield, Esq., (counsel for Ms. Nupson and Mrs. Middleton) re March 31, 2003 Payments to Noteholders, with attached account statements for 1994 Anna Trust	First page of handwritten notes by John S. Middleton directed to Larry Laubach, Esq., re promissory notes redacted as attorney-client privileged.	Bradford; John as Bradford officer	No, relates to Bradford's calculation of its interest payments under promissory notes	N/A	None
BHICOZ 005822	1994/09/12 – Agreement of Trust for 1994 Anna Trust	Richard Silpe (Cozen, counsel for Bradford and for John individually and as officer of Bradford, Trustee and sole beneficiary of the original 2001 GRAT, and Trustee of the 1994 Anna Trust) handwritten notes from 01/03 - 02/03 re issues for client redacted as attorney-client privileged	Bradford, John individually and John as Trustee of 1994 Anna Trust for which Ms. Nupson was a beneficiary at the time of the document's creation.	Yes - relates to Family Settlement Agreement re 1994 Anna Trust	N/A	None
BHI003345	1999/01/01 - 1999/12/31 - John S. Middleton desk calendar for 1999	Entries redacted on: 2/01, 6/24, 9/28, 10/11, 10/12, 10/18, 11/15, 11/6, and 11/22 –	Bradford and/or Double Play	No - does not refer to trust of any kind	Unredacted document was among documents inadvertently produced when Blank Rome responded to	8

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		questions/issues for discussion by John Middleton with Larry Laubach, Esq., as counsel for Bradford and Double Play re Phillies/Double Play partnership and other legal issues relating to Bradford planning redacted as attorney-client privilege			Defendants' subpoena, was subject to clawback request and Motion to Compel Compliance with Protective Order, which was granted by the Court. Plaintiff did not challenge invocation of privilege at that time and agreed to return/certify to destruction of this document.	
BHI003973	2000/01/01 - 2000/12/31 - John S. Middleton desk calendar for 2000	Entries redacted on 1/14, 2/22, 5/2, 5/26, 7/26, 8/15, 10/5, 10/6, 10/9, 10/10, 10/11, 11/15 – comments/questions by John Middleton to Larry Laubach, Esq., as counsel for Bradford, about legal issues relating to Bradford planning redacted as attorney-client privilege	Bradford	No - does not refer to trust of any kind	Unredacted document was among documents inadvertently produced when Blank Rome responded to Defendants' subpoena, was subject to clawback request and Motion to Compel Compliance with Protective Order, which was granted by the Court. Plaintiff did not challenge invocation of privilege at that time and agreed to return/certify to destruction of this document.	8

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BHI004601	2001/01/01 - 2001/12/31 - John S. Middleton desk calendar for 2001	Entries redacted on 1/16, 1/24, 1/26, 1/29, 4/4, 4/5, 4/17, 4/23, 4/25, 5/1, 5/29, 8/6, 10/4, 11/14, 11/27 – comments/questions by John Middleton for Larry Laubach, Esq., Bruce Rosenfield, Esq., and/or John Stine (accountant retained to provide services to assist counsel in providing legal advice) re S-Corp conversion and related issues redacted as attorney-client privilege	Bradford	No - does not refer to trust of any kind	Unredacted document was among documents inadvertently produced when Blank Rome responded to Defendants' subpoena, was subject to clawback request and Motion to Compel Compliance with Protective Order, which was granted by the Court. Plaintiff did not challenge invocation of privilege at that time and agreed to return/certify to destruction of this document.	8
BHI011707	2003/03/03 - Exhibit G-11 – draft Stock Purchase Agreement	John S. Middleton handwritten notes for issues to discuss re draft document with Larry Laubach, Esq., as counsel for Bradford, John as Bradford officer, and John individually relating to repurchase of shares from 1994 GST trust for benefit of John C. Hughes - redacted as	Bradford, John as Bradford officer, and John individually	No - notes re Stock Purchase Agreement relates to GST Trust for John Hughes	N/A	None

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		attorney-client privileged				
BHI041291	2002/10/14 – Larry Laubach email to John S. Middleton, Scott Barbakoff with 10/13/2002 email from Michael Gunter (Gunter email is produced in entirety)	Redaction of top email from Larry Laubach to John Middleton and Scott Barbakoff (Cozen attorney) re Michael Gunter email redacted as attorney-client privileged	Bradford, John individually, John as Bradford officer, as Trustee and beneficiary of the original GRAT for which Ms. Nupson was not a beneficiary at the time of the document's creation	No - redacted information does not refer to 1994 Anna Trust and she was not a beneficiary of the original 2001 Trust at the time document was created	N/A	None
BHI042303	2002/10/14 – Larry Laubach email to John S. Middleton and Scott Barbakoff with 10/13/2002 email from Michael Gunter (Gunter email is produced in entirety)	Redaction of top email from Larry Laubach to John Middleton and Scott Barbakoff (Cozen attorney) re Michael Gunter email redacted as attorney-client privileged	Bradford, John individually, John as Bradford officer, as Trustee and beneficiary of the original GRAT for which Ms. Nupson was not a beneficiary at the time of the document's creation	No - redacted information does not refer to 1994 Anna Trust and she was not a beneficiary of the original 2001 Trust at the time document was created	N/A	None
BHI042423	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHI046191	2002/03/12 Email chain from Womble Carlyle to Bruce Rosenfield	Top emails among Bruce Rosenfield, Larry Laubach and John S. Middleton redacted as attorney-client privileged and work product	Bradford, John as officer of Bradford	No	N/A	8
BHI049980	2000/11/13 – Howard Lawson report	First page redacted as W/P – Note taken by Rebecca Ward, Esq. (Blank Rome) during document collection in the current litigation	Bradford, John individually, and John in his capacity as Trustee for the 1994 Anna Trusts and the Modified 2001 GRAT	No - redacted note does not refer to administration of the Trusts, but instead is simply counsel's notation taken in process of collecting documents.	The underlying document—the Howard Lawson Report – has been produced in full, with the starting Bates-number BHI049980. The <i>only</i> redacted information is a handwritten	8

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					note taken by Blank Rome attorney Rebecca Ward in course of document collection to respond to Ms. Nupson's discovery requests in the Orphan's Court Litigation.	
BHI050090	Stock ledgers	First page redacted as W/P – Note taken by Rebecca D. Ward, Esq. (Blank Rome) during document collection in the current litigation	Bradford, John individually, and John in his capacity as Trustee for the 1994 Anna Trusts and the Modified 2001 GRAT	No - redacted note does not refer to administration of the Trusts, but instead is simply counsel's notation taken in process of collecting documents.	The underlying documents — the Stock Ledgers – have been produced in full, with the starting Bates-number BHI049980. The <i>only</i> redacted information is a handwritten note taken by Blank Rome attorney Rebecca Ward in course of document collection to respond to Ms. Nupson's discovery requests in the Orphan's Court Litigation.	8
BHI057025 - BHI057030 [Only page BHI057030 is redacted]	BHI Standard Journal Entries posted 2004/4/30 for Fleet-Project Apple 1-Retainer Fee and Fleet-Valuation as of 2/1/01, and supporting documents.	2002/04/03 Letter from Bruce Rosenfield as counsel for Bradford to John Middleton re Fleet Engagement letter, cc to Larry Laubach, as counsel for Bradford, redacted as attorney-	Bradford	No -- redacted information does not refer to any trust of any kind	N/A	1, 8

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		client privileged				
BHI067178	2001/03/08 – Ernst & Young Audit Report and Consolidated Financial Statements for years ended January 31, 2001 and 2000	Robert Siwicki handwritten note re conversation with Annette Madison re tax issues redacted from first page as attorney-client privileged	Bradford, McIntosh Inns	No - redacted note does not refer to any trust for which Ms. Nupson has ever been a beneficiary	N/A	1, 8
BHI067211	2002/01/22 – Projected Net Dollar Revenue by Brand for John Middleton, Inc.	2002/04/18 – body of Michael Burke of Fleet M&A Advisors email to Clint Price of JMI, Robert Siwicki, A. Traynham (Fleet) with handwritten note by Clint Price re JMI redacted as attorney-client privileged	Bradford; JMI (which is now owned by Philip Morris USA, Inc.)	No	N/A	1, 8
BHI067408	2001/09/14 Depreciation Expenses Estimate for 5 Fiscal years Beginning FY 2001	Body of 2001/09/14 letter from Clint Price (JMI officer) to Robert Siwicki re information requested for valuation and body of 2001/09/14 letter from Wil Ridington (JMI officer) to Robert Siwicki re depreciation redacted as attorney-client privileged	Bradford, JMI (which is now owned by Philip Morris USA, Inc.)	No	N/A	1, 8

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BHI067421	2001 Marketing Brochure for John Middleton, Inc.	Body of 2001/08/08 Clint Price (JMI officer) Memorandum to Robert Siwicki re JMI and its products redacted as attorney-client privileged	Bradford, JMI (which is now owned by Philip Morris USA, Inc.)	No	N/A	1, 8
BHICOZ 011524 ONLY PAGE REDACTED: D: BHICOZ 011546	1995/09/22 - Communication from Herbert Middleton to Bruce Rosenfield, Esq. and John Stine regarding misc. matters for Mr. Middleton	Redacted BHIC0Z011546 as non-responsive and attorney/client.	Privilege as to BHICOZ011546 held by John Middleton in his capacity as the Executor of the Estate of Herbert H. Middleton, Jr.	No	N/A	None
BHISH 001077	2011/10/07 – 09: Emails between Bruce Rosenfield, Leah Ricci and John S. Middleton	Redacted as non-responsive portions of emails relating to matters other than Anna Nupson or trust for which she is a beneficiary	N/A	No	N/A	8
BHICOZ 015553	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 015564	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 016752	5/19/2004 16:01 email from L. Laubach to Bruce Rosenfield and Amy	Attorney-client privilege; non-responsive	John and Leigh Middleton individually	No	This document contains redactions of information pertaining only to personal	None

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	Newman (both of Schnader) re various matters on behalf of Middleton family. Communication regarding personal legal issue relating to John and Leigh Middleton and their children redacted				information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	
BHICOZ 016971	6/5/2003 21:22 email from L. Laubach to J. Middleton re original settlement documents	Redacted body of email between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses true up to be completed in connection with division of 1994 Anna Trust into fbo Hughes and fbo Middleton shares.	Interests of John as trustee differed from interests of beneficiaries in the Hughes Family. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary	None
BHICOZ 017637	1/31/2003 15:12 email from John Stine to Laura MacDonough (both of E&Y), cc to L. Laubach re corporate promissory note and stock purchase agreement	Redacted body of email among J. Stine, L. MacDonough and L. Laubach as attorney/client privileged. Financial advisor required to assist counsel in providing legal advice to client	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - redacted information refers to, inter alia, Stock Purchase Agreement for repurchase of stock from the 1994 Anna Trust and promissory note from Bradford	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary	8
BHICOZ 018904	1/31/2003 23:03 email from L. Laubach to R. Silpe (Cozen) and John Stine	Redacted body of email from L. Laubach to J. Stine as attorney-client	John individually and as Trustee of the 1994 Grandchildren's Trust	No	N/A	8

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	(E&Y) re advice to clients re negotiations with Hughes family re 1994 Grandchildren's Trust	privileged and work product. Financial advisor required to assist counsel in providing legal advice to client				
BHICOZ 019023	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 019078	4/6/2004 21:47 email from L. Laubach to J. Middleton re Hughes family and settlement agreement	Redacted body of email between L. Laubach and J. Middleton re true up and other outstanding issues as attorney/client privileged	John individually and as Trustee of the Anna 1994 Trust	Yes - addresses true up to be completed in connection with division of 1994 Anna Trust into fbo Hughes and fbo Middleton shares	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary	7
BHICOZ 019166	2/6/2003 13:59 email from Bruce Rosenfield to L. Laubach re advice to J. Middleton about 1996 Trust established for benefit of John Powers Middleton, with attachment (listed below)	Redacted email between B. Rosenfield and L. Laubach re J. Middleton/L. Middleton trust for benefit of their children as non-responsive and attorney/client privileged	John and Leigh Middleton individually	No	This document contains redactions of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	8
BHICOZ 019427	2/12/2003 13:55 email from L. Laubach to Scott Barbakoff (Cozen) re advice to client about stock power for Lucia Hughes as custodian for her son Alex	Redacted body of email from L. Laubach to S. Barbakoff as attorney-client privileged and work product	Bradford, John individually	No	N/A	None

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BHICOZ 019743	5/19/2004 16:01 email from L. Laubach to Bruce Rosenfield re various matters on behalf of Middleton family. Bodies of emails between L. Laubach and B. Rosenfield re personal legal issue relating to John and Leigh Middleton and their children redacted	Attorney-client privilege; non-responsive	John and Leigh Middleton individually	No -- redacted information does not refer to any trust for which Ms. Nupson has ever been a beneficiary This document contains redactions of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	N/A	8
BHICOZ 019954	2/15/2003 18:47 email from L. Laubach to John Middleton re Exhibits U, V, W to master Settlement Agreement and side Letter re indemnification for any tax consequences from modifying original 2001 GRAT	Redacted body of email between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually, as Trustee of the original 2001 GRAT (of which Ms. Nupson was not a beneficiary), the 1994 Anna Trust and the 1994 Grandchildren's Trust (of which Ms. Nupson was not a beneficiary)	Yes - addresses, among other things, changes to 2003 Master Settlement Agreement, including stock purchase agreements	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	8
BHICOZ 020847	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 021206	4/6/2004 21:48 email from L. Laubach to John Stine (E&Y) re legal and tax	Redacted body of email from L. Laubach to J. Stine as attorney/client	Bradford, John individually and as Trustee of 1994 Anna Trusts	Yes - addresses, among other things, true-up calculations for 1994 Trust	Interests of John as trustee differed from interests of beneficiaries. In addition, legal	8

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	issues relating to settlement with Hughes family	privileged. Financial advisor required to assist counsel in providing legal advice to client			fees were not paid from trusts of which Ms. Nupson is a beneficiary.	
BHICOZ 021836	2/18/2003 21:13 email from James B. Jumper to L. Laubach (both of Cozen) re communications with or legal advice to clients re Exhibit 2 to master Settlement Agreement	Redacted body of emails among J. Jumper, L. Laubach, S. Barbakoff and J. Middleton re receipt and release agreement in 1994 Grandchildren's Trust as attorney/client privileged	John as Trustee of the 1994 Grandchildren's Trusts, of which Ms. Nupson is not a beneficiary	No	N/A	None
BHICOZ 022838	1/30/2003 18:58 email from Laubach, Larry P. to John Middleton and Scott Barbakoff (Cozen) re settlement discussions with Hughes family	Redacted body of email from L. Laubach to J. Middleton, S. Barbakoff as attorney/client privileged.	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including promissory notes to be issued in connection with redemption of shares by, among others, the Anna 1994 Trust	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 022988	4/6/2004 21:47 email from Laubach, Larry P. to John Middleton re settlement with Hughes family	Redacted bodies of emails between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of 1994 Anna Trusts	Yes - addresses, among other things, true-up calculations for 1994 Trust	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 023802	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 023835						

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BHICOZ 023848						
BHICOZ 023903	2/12/2003 13:47 email from Laubach, Larry P. to John Middleton re corporate dividend	Redacted bodies of emails between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses, among other things, tax liability for shareholders and stock purchase closing date	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 023919	2/5/2003 19:24 email from Laubach, Larry P. to John Middleton re comments on draft settlement agreement	Redacted bodies of emails between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including proposed changes by Lucia Hughes	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 027788	1/31/2003 23:03 email from Larry P. Laubach to John Stine (E&Y) and Richard Silpe (Cozen) re communications with and/or advice to clients re discussions with Hughes family	Redacted body of email from L. Laubach to J. Stine as attorney/client privileged. Financial advisor required to assist counsel in providing legal advice to client	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including proposed changes by Lucia Hughes	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	8
BHICOZ 028612	2/4/2003 15:52 email from Larry P. Laubach to John Middleton and Scott Barbakoff (Cozen) re revised settlement agreement	Redacted body of email between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including proposed changes by Lucia Hughes	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None

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BHICOZ 029475	2/6/2003 18:02 email from Scott D. Barbakoff to L. Laubach re communications with and/or advice to clients re closing of books on notes and stock purchase agreements	Redacted body of S. Barbakoff email to L. Laubach as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - redacted notes refer to, inter alia, Stock Purchase Agreement for repurchase of stock from the 1994 Anna Trust and promissory note from Bradford	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary	None
BHICOZ 030150	1/31/2003 15:12 email from John Stine to Laura MacDonough (both of E&Y) and L. Laubach re corporate promissory note and stock purchase agreement	Redacted body of J. Stine email to L. Laubach, L. MacDonough as attorney/client privileged. Financial advisor required to assist counsel in providing legal advice to client	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - redacted information refers to, inter alia, Stock Purchase Agreement for repurchase of stock from the 1994 Anna Trust and promissory note from Bradford	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary	8
BHICOZ 030518	1/30/2003 18:58 email from Larry P. Laubach to John Middleton and Scott Barbakoff (Cozen) re settlement discussions with Hughes family	Redacted body of email among L. Laubach, S. Barbakoff and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including promissory notes to be issued in connection with redemption of shares by, among others, the Anna 1994 Trust	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 030561	3/6/2003 23:35 email from Larry P. Laubach to John Stine (E&Y), John Middleton, Scott Barbakoff (Cozen) re timeline for closing on settlement documents	Redacted body of email among L. Laubach, S. Barbakoff, J. Stine and J. Middleton as attorney/client privileged. Financial advisor required to assist counsel	Bradford, John individually and as Trustee of the 1994 Anna Trust, the Modified 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses, among other things, tax liability for shareholders and stock purchase closing date	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	8

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		in providing legal advice to client				
BHICOZ 031370	2/5/2003 19:24 email from Larry P. Laubach to John Middleton re comments on settlement agreement	Redacted body of email between L. Laubach and J. Middleton as attorney/client privileged	Bradford, John individually and as Trustee of the 1994 Anna Trust, the original 2001 GRAT, and the 1994 Grandchildren's Trust	Yes - addresses status of negotiations, including proposed changes by Lucia Hughes	Interests of John as trustee differed from interests of beneficiaries. In addition, legal fees were not paid from trusts of which Ms. Nupson is a beneficiary.	None
BHISH 003751	2011/03/08 Emails between Bruce Rosenfield and John S. Middleton relating to personal estate planning for John S. Middleton, i.e., matters other than Anna Nupson or trust for which she is a beneficiary, redacted	non-responsive; attorney/client privileged	John S. Middleton	No	N/A This document contains redactions of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	8
BHISH 003823	2012/08/31 Emails between John S. Middleton and Bruce Rosenfield. Information regarding health of Bruce Rosenfield's wife redacted.	Confidential	N/A	No	N/A	8
BHISH 003831	2013/12/23 Emails between Bruce Rosenfield and John S. Middleton regarding	Confidential	N/A	No	"Personal/Non-Responsive Documents" – only redactions are of Account Numbers and	8

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	Marital Trust of Herbert H. Middleton. ABA number and account number of Schnader Harrison redacted.				ABA routing numbers.	
BHISH 003950	2011/01/12 Emails among Roberta McAndrew (Schnader), Bruce Rosenfield and John S. Middleton. Communication regarding health issue of Leigh P. Middleton redacted.	Non-responsive; Confidential	John S. Middleton; Leigh P. Middleton	No	N/A	8
BHISH 003963	2011/01/12 Emails between Bruce Rosenfield and John Middleton. Communication regarding health issue of Leigh P. Middleton redacted.	Non-responsive; Confidential	John S. Middleton; Leigh P. Middleton	No	N/A	8
BHISH 03999	2012/08/27 Emails between Bruce Rosenfield and John Middleton. Information regarding health of Bruce Rosenfield's wife redacted.	Confidential	N/A	No	N/A	8
BHISH 003521	2012/06/01 Emails among Larry Laubach, Bruce Rosenfield, John Middleton and John Stine regarding estate planning for John S.	Non-responsive; attorney-client privilege	John S. Middleton; Leigh P. Middleton	No	This document contains redactions of information pertaining only to personal estate planning for John S. Middleton, Leigh P. Middleton,	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Middleton and Leigh P. Middleton redacted.				their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit	
BHISH 003538	2011/04/27 Emails between John S. Middleton and Bruce Rosenfield regarding forwarded email from Tom Riley regarding estate planning and life insurance for John S. Middleton and his family redacted.	Redacted as non-responsive and attorney/client privileged portions of emails relating to personal estate planning for John S. Middleton, i.e., matters other than Anna Nupson or trust for which she is a beneficiary	John S. Middleton	No	This document contains redactions of information pertaining only to John S. Middleton's personal estate planning.	8
BHISH 003540	2008/12/18 Emails between John Middleton and Bruce Rosenfield relating to personal legal matters for J. Middleton, i.e., matters other than Anna Nupson or trust for which she is a beneficiary, redacted.	Non-responsive; attorney-client privilege	John Middleton	No	N/A	8
BHISH 003554	2011/11/03 Emails between Bruce Rosenfield and John Middleton relating to personal financial accounts of John S. Middleton and his family, i.e., matters other	Non-responsive; attorney-client privilege	John S. Middleton; Leigh P. Middleton	No	This document contains redactions of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	than Anna Nupson or trust for which she is a beneficiary, redacted				P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	
BHISH 003571	2009/09/14 – Emails between Bruce Rosenfield, John S. Middleton and Anna Nupson. Communication regarding health of Bruce Rosenfield’s wife redacted	Confidential	N/A	No	N/A	8
BHISH 003628	2012/08/31 Emails among Larry Laubach, Bruce Rosenfield and John S. Middleton. Information regarding health of Bruce Rosenfield’s wife redacted.	Confidential	N/A	No	N/A	8
BHISH 003714	2012/08/31 Emails among Larry Laubach, Bruce Rosenfield and John Middleton. Information regarding health of Bruce Rosenfield’s wife redacted.	Confidential	N/A	No	N/A	8
BHICOZ 038996	2010/5/12 Email from L. Laubach to John S. Middleton regarding negotiations with Ms. Hughes's attorney, Jill Raspet, about negotiations regarding 1994 Anna Trust	Redacted body of email from L. Laubach to J. Middleton as AC	John individually and as Trustee of 1994 Anna Trusts	Yes - addresses, among other things, true up to be completed in connection with division of 1994 Anna Trust into fbo Hughes and fbo Middleton shares	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7

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BHICOZ 031533	2010/09/27 Email from L. Laubach to John Middleton regarding negotiations with Bruce Rosenfield and Ms. Nupson regarding 1994 Anna Trust	Redacted body of email from L. Laubach to J. Middleton as AC	John individually and as Trustee of 1994 Anna Trusts	Yes - addresses distributions from Anna 1994 Trust in context of negotiations with Lucia Hughes regarding true-up calculations, possible unitrust conversion and accountings	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7
BHICOZ 039219	12/21/2010 Email from L. Laubach to John Middleton regarding Ms. Nupson's demand that 1994 Anna Trust pay for expenses	Redacted body of email from L. Laubach to J. Middleton as AC	John individually and as Trustee of 1994 Anna Trusts	Yes - addresses issues raised in accounting for 1994 Anna Trusts	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7
BHICOZ 031757	2012/11/21 L. Laubach email to John Middleton re trust payout rates and personal information of L. Laubach	Redacted body of emails between J. Middleton and L. Laubach as AC	John Middleton individually and as Trustee of the 1994 Anna Trusts	Yes - addresses payout rates for distributions from 1994 Anna Trusts	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7 as to part of redacted information None as to balance of redacted information
BHICOZ 031861	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 037343	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 037436	2014/06/04 Bruce Rosenfield email to John Middleton and Larry Laubach re Ms. Nupson's	Redacted body of top email from Bruce Rosenfield to John Middleton and Larry	John Middleton individually, as Trustee of the May 1982 Trust and as Trustee of the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms.	6, 7

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	demand for distribution from May 1982 trust due to invalidity of assignment	Laubach as AC and WP			Nupson is a beneficiary.	
BHICOZ 032296	2014/06/10 Larry Laubach email to John Middleton and Bruce Rosenfield regarding Ms. Nupson's demands relating to May 1982 and 1994 Anna Trusts	Redacted body of top email from Larry Laubach to Bruce Rosenfield and John Middleton as AC and WP	John Middleton individually, as trustee of the May 1982 Trust and the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	6, 7
BHICOZ 032301	2014/07/04 Bruce Rosenfield letter to Larry Laubach and John Middleton re demand letter from Hughes family in response to correspondence from Thomas Mucci as counsel for Ms. Nupson	Redacted body of top email from Bruce Rosenfield to John Middleton and Larry Laubach as AC and WP	John Middleton individually, as trustee of the May 1982 Trust and the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	6, 7, 8
BHICOZ 032397	2015/01/21 Margaret Thompson email to John Middleton, James Mannion and Larry Laubach regarding 1994 Anna Trust distributions	Redacted body of top emails among Margaret Thompson, Larry Laubach (both of Cozen), James Mannion and John Middleton as AC and WP	John Middleton individually and as trustee of the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7
BHICOZ 032399	2015/01/21 John Middleton email to James Mannion, Margaret Thompson and Larry Laubach regarding 1994 Anna Trust	Redacted body of top emails among Margaret Thompson, Larry Laubach (both of Cozen), James Mannion and John	John Middleton individually and as trustee of the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	7

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		Middleton as AC and WP				
BHICOZ 032441	2010/08/16 Larry Laubach email to John Middleton regarding discussion with Ms. Hughes's attorney Jill Raspet	Redacted body of email between Larry Laubach and John Middleton as AC	John individually and as Trustee of 1994 Anna Trusts	Yes - addresses, among other things, distributions from 1994 Anna Trust in context of negotiations	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 032446	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 039420	2010/09/27 Larry Laubach email to John Middleton regarding Ms. Nupson's request for distributions in Anna 1994 Trust in context of negotiations with Ms. Hughes	Redacted body of email between L. Laubach and J. Middleton as attorney/client privileged	John, individually and as Trustee of the 1994 Anna Trusts	Yes - addresses, among other things, distributions from 1994 Anna Trust in context of negotiations	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 039423	2011/09/24 John Middleton email to Larry Laubach regarding distributions from 1994 Anna Trusts, negotiations with Lucia Hughes and Ms. Nupson's potential challenge to 1994 Anna Trust	Redacted body of email between Larry Laubach and John Middleton as AC	John Middleton individually and as trustee of the 1994 Anna Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	None
BHICOZ 039434	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
BHICOZ 033062	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					

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BHICOZ 040154	2014/01/06 Email chain between Margaret Thompson, Bruce Rosenfield and Larry Laubach re Ms. Nupson's demands in various family trusts and estates	Redacted body of referenced emails as AC	John Middleton individually, as Trustee of the 1972 Trust, as Trustee of the May 1982 Trust, as Trustee of the 1994 Anna Trusts, as former Trustee of the Modified 2001 GRAT, as Executor of the Estate of Frances S. Middleton, and as Executor of the Estate of Herbert Middleton	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	2, 3, 6, 7, 8
BHICOZ 038436	2014/10/14 Larry Laubach email to Margaret Thompson and Bruce Rosenfield re Ms. Nupson's demands in various family trusts and estates	Redacted body of referenced email as AC and WP	John Middleton individually, as trustee of the 1972 Trust, as Trustee of the May 1982 Trust, as Trustee of the 1990 Trust, and as Trustee of the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	6, 7, 8
BHICOZ 038442	2014/10/15 Wilbur Kipnes email to Larry Laubach and Bruce Rosenfield re Ms. Nupson's demands in various family trusts and estates	Redacted body of referenced email as AC and WP	John Middleton individually, as trustee of the 1972 Trust, as Trustee of the May 1982 Trust, as Trustee of the 1990 Trust, and as Trustee of the 1994 Anna Trusts	Yes	Yes - litigation threatened by beneficiary. It is unclear whether legal fees were paid from trusts of which Ms. Nupson is a beneficiary.	6, 7, 8
BHISH 029638	2013/08/05 Emails among Rosemary Maher and Bruce Rosenfield (both of Schnader), John Middleton, and Michael Kelly	Nonresponsive; Confidential	Bradford	No	N/A	8

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	(accountant at Dock Street Capital) regarding trusts for individuals other than Ms. Nupson redacted. Page SH029642 is the only page with a redaction, and the redaction relates to Trusts for individuals other than the Middleton family.					
BHISH 040533	2012/06/01 Emails among Bruce Rosenfield, Jennifer Stoudt, Nadine Doolittle, Roberta McAndrew (all of Schnader), John S. Middleton, Larry P. Laubach (of Cozen) and John Stine (of Grant Thornton) regarding estate planning for John S. Middleton and his family redacted.	Non-responsive; Confidential; Attorney-client privileged; Work product doctrine	John S. Middleton; Leigh P. Middleton	No	This document contains redactions of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	8
BHISH 042019	2006/12/04 Emails among Nancy Pole, Bruce Rosenfield, Amy Newman, Nadine Doolittle regarding 2001 JSM Family Trust and Trust for Hughes Family under 2001 GRAT redacted	Redacted portions of email relating to J. Middleton and Hughes Family Trusts for which Anna Nupson is not a beneficiary as non-responsive and A/C	John Middleton individually and as trustee of a trust of which Ms. Nupson is not a beneficiary	No	This document contains redactions of information pertaining only to the trusts created under the 2001 GRAT for the benefit of the Hughes Family and John S. Middleton's Family, and not	8

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					Ms. Nupson	
BHICOZ 041105	2002/03/12 Bruce Rosenfield Email to Larry Laubach re demand for information from Lucia Hughes	Redacted body of email as A/C	Bradford	No	N/A	None
10	2002/04/05 – Letter from Larry Laubach, Esq., to Bruce Rosenfield, Esq., both as counsel to Bradford Holdings, Inc. (“Bradford”), enclosing 2002/03/12 analysis of Bradford prepared by John Stine/Ernst & Young at request of counsel to assist counsel in providing legal advice to Bradford regarding conversion from C-Corp to S-Corp status	A/C	Bradford	No	N/A	8
11	2002/05/13 – Memorandum from Larry Laubach, Esq., to John S. Middleton regarding election of directors	A/C	Bradford	No	N/A	8
14	2001/02/21 – John S.	A/C	Bradford	No	N/A	None

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	Middleton email to Larry Laubach, Esq. re Thorkelson and Smith					
17	2000/09/28 - Bruce Rosenfield, Esq., memorandum, with attached agenda, to Roy Ross, Esq., (both as counsel to John Middleton individually and Frances S. Middleton) and Larry Laubach, Esq. re discussions with John S. Middleton and Frances Middleton re her estate planning.	A/C – FSM Executors	John individually; John as Executor and Ms. Hughes as Executrix of the Estate of Frances S. Middleton	No – does not refer to any trust for which Ms. Nupson is a beneficiary; relates to Frances Middleton’s estate planning.	N/A	3, 8
18	2000/08/02 - John S. Middleton email to Larry Laubach, Esq. and Bruce Rosenfield, Esq. (both as counsel for Bradford) soliciting comments on attached draft letter to Robert Siwicki regarding issues for which Mr. Siwicki was retained at request of counsel to assist counsel in giving legal advice to Bradford regarding	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8

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	conversion from C-Corp to S-Corp status					
19	2000/08/02 - John S. Middleton letter to Bruce Rosenfield, Esq., as counsel for Bradford and Double Play, re issues for which Mr. Siwicki was retained at request of counsel to assist counsel in giving legal advice to Bradford regarding conversion from C-Corp to S-Corp status	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8
20	2000/06/14 - John S. Middleton email to Bruce Rosenfield, Esq., cc to Larry Laubach, Esq., both as counsel for Bradford and Double Play, re Howard Lawson	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8
27	1998/07/30 - Ivy Shapiro (paralegal with Schnader, counsel for Bradford) letter to Richard Shaffert (Bradford) re G.W. Hunter Articles of Dissolution	A/C	Bradford	No	N/A	None
28	1997/08/19 - Margaret Thompson, Esq., as counsel	A/C	Bradford	No – relates to advice to parent corporation about propriety of	N/A	None

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	for Bradford, letter to Richard Shaffert re tax issues for Bradford relating to Assignments of Split-Dollar Agreements from parent corporation to subsidiary.			assignment to subsidiary corporation		
33	2002/04/01 – Letter agreement between Bruce Rosenfield/Schnader Harrison Segal & Lewis LLP (“Schnader”) as counsel for Bradford and Fleet Advisors regarding engagement to provide services to assist counsel in advising client.	A/C	Bradford	No	N/A	1, 8
34	2002/04/03 - Bruce Rosenfield, Esq., as counsel for Bradford, letter to John S. Middleton, cc to Larry Laubach, Esq., as counsel for Bradford, re Fleet engagement letter.	A/C	Bradford	No	N/A	1, 8
35	2002/01/25 - draft of Fleet Advisors engagement letter, with Larry Laubach, Esq., as counsel for Bradford,	A/C	Bradford	No	N/A	1

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	handwritten notes re advice to client re same.					
36	2002/11/22 - Fleet Advisors Built in Gains Valuation as of 2/1/2001, prepared pursuant to engagement by Schnader/Bruce Rosenfield as counsel for Bradford to assist in providing legal advice to client regarding conversion to S-Corp.	A/C	Bradford	No	N/A	1, 8
37	2002/07/30 – Letter from Robert Siwicki to Bruce A. Rosenfield, Esq., as counsel for Bradford, regarding draft valuation requested by counsel to assist counsel in providing legal advice to client regarding conversion to S-Corp.	A/C	Bradford	No	N/A	1, 8
38	2002/04/01 – Letter agreement between Bruce Rosenfield/Schnader Harrison Segal & Lewis LLP (“Schnader”), as counsel for Bradford, and Fleet Advisors regarding engagement to provide	A/C	Bradford	No	N/A	1, 8

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	services to assist counsel in advising client.					
39	2001/08/31 - Letter agreement with Fleet Advisors regarding access to confidential Bradford information in connection with engagement to provide services to assist Bruce Rosenfield/Schnader as counsel for Bradford in advising client	A/C	Bradford	No	N/A	1, 8
40	2001/08/31 - Letter agreement with Fleet Advisors regarding access to confidential Bradford information in connection with engagement to provide services to assist Bruce Rosenfield/Schnader as counsel for Bradford in advising client	A/C	Bradford	No	N/A	1, 8
41	2002/01/30 – black-lined draft of letter agreement by Bruce Rosenfield/Schnader, as counsel for Bradford, with Fleet Advisors regarding engagement to	A/C	Bradford	No	N/A	1, 8

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	provide services to assist counsel in advising client					
42	2002/01/30 – Email from Fleet Advisors to Larry Laubach, Esq., as counsel for Bradford, with clean and black-lined versions of letter regarding engagement to provide services to assist counsel in advising client.	A/C	Bradford	No	N/A	1
43	2001/05/25 - Larry Laubach, Esq., as counsel for Bradford, letter to Robert Siwicki with marked-up letter regarding Howard Lawson engagement to provide services to assist counsel in advising client.	A/C	Bradford	No	N/A	1
44	2002/03/14 – Emails between Robert Siwicki and Larry Laubach, Esq., as counsel for Bradford, emails re Fleet Advisors’ access to proprietary information of Bradford	A/C	Bradford	No	N/A	1
45	2002/03/14 - Emails between Robert Siwicki and Larry Laubach, Esq., as	A/C	Bradford	No	N/A	1

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	counsel for Bradford, emails re Fleet Advisors' access to proprietary information of Bradford					
46	2002/02/05 - Larry Laubach, Esq., as counsel for Bradford, memorandum to Robert Siwicky and Andrea Falcone of Fleet Advisors re Fleet Advisors' access to proprietary information of Bradford	A/C	Bradford	No	N/A	1
47	2002/02/01 - Larry Laubach, Esq., as counsel for Bradford, memorandum to Robert Siwicky and Andrea Falcone of Fleet Advisors re Fleet Advisors' access to proprietary information of Bradford	A/C	Bradford	No	N/A	1
48	2002/01/25 – Larry Laubach/Bruce Rosenfield/Schnader as counsel for Bradford black-line of Bradford/Fleet Advisors agreement re access to proprietary information of Bradford	A/C	Bradford	No	N/A	1, 8

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49	2002/01/25 – Larry Laubach/Bruce Rosenfield/Schnader as counsel for Bradford black-line of letter re Fleet Advisors’ engagement to provide services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
50	2002/01/25 – Larry Laubach/Bruce Rosenfield/Schnader as counsel for Bradford black-line of letter re Fleet Advisors’ engagement to provide services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
51	2002/01/17 - 2002/01/25 - Larry Laubach/Bruce Rosenfield/Schnader as counsel for Bradford black-line of letter re Fleet Advisors’ engagement to provide services to assist counsel in advising client with handwritten notes by Larry Laubach, Esq.	A/C	Bradford	No	N/A	1
52	2002/04/17 - Larry Laubach, Esq., as counsel for	A/C	Bradford	No	N/A	1

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	Bradford, letter to Robert Siwicki regarding engagement of Fleet Advisors to assist counsel in giving legal advice to client					
53	2002/04/03 - Larry Laubach, Esq., as counsel for Bradford, cover letter to Robert Siwicki re engagement by counsel for Built-In Gains valuation and confidentiality agreement	A/C	Bradford	No	N/A	1
54	2002/04/01 – Letter between Bruce Rosenfield/Schnader as counsel for Bradford and Fleet Advisors regarding engagement for Built-In Gains valuation to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
55	2002/04/1 – Robert Siwicki letter to Larry Laubach, Esq., as counsel for Bradford, re engagement for Built-In Gains valuation to assist counsel in advising client	A/C	Bradford	No	N/A	1
56	2001/08/31 – Bradford letter agreement with Fleet	A/C	Bradford	No	N/A	1, 8

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	Advisors regarding access to confidential Bradford information in connection with engagement to provide services to assist counsel in advising client					
57	2002/04/01 – Bruce Rosenfield/Schnader, as counsel for Bradford, letter engaging Fleet Advisors to provide valuation to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
58	2002/05/07 - Draft report of Fleet Advisors to Bruce Rosenfield and Larry Laubach, as counsel to Bradford, to assist counsel in providing legal advice to client with Larry Laubach, Esq. handwritten notes	A/C	Bradford	No	N/A	1
65	2002/04/1 – Letter from Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford, regarding Schnader's engagement of Fleet M&A Advisors to provide professional services to assist counsel in	A/C	Bradford	No	N/A	1, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	advising client.					
66	2002/04/1 – Letter from Robert Siwicki to John S. Middleton regarding engagement by Bruce Rosenfield/Schnader as counsel for Bradford for Built-In Gains valuation	A/C	Bradford	No	N/A	1, 8
67	2002/04/1 – Letter from Robert Siwicki to John S. Middleton regarding engagement by Bruce Rosenfield/Schnader as counsel for Bradford for Built-In Gains valuation	A/C	Bradford	No	N/A	1, 8
68	2002/04/1 - Letter from Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford, regarding Schnader's engagement of Fleet M&A Advisors to provide professional services to assist counsel in providing advice to client	A/C	Bradford	No	N/A	1, 8
69	2002/04/1 - Letter from Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford, regarding	A/C	Bradford	No	N/A	1, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Schnader's engagement of Fleet M&A Advisors to provide professional services to assist counsel in providing advice to client					
70	2001/08/31 - Bradford Letter agreement with Fleet Advisors regarding access to confidential Bradford information in connection with engagement by Bruce Rosenfield/Schnader as counsel for Bradford to provide services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
71	2001/08/31 - Bradford Letter agreement with Fleet Advisors regarding access to confidential Bradford information in connection with engagement by Bruce Rosenfield/Schnader as counsel for Bradford to provide services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
72	2001/08/31 - Bradford Letter agreement with Fleet Advisors regarding access to	A/C	Bradford	No	N/A	1, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	confidential Bradford information in connection with engagement by Bruce Rosenfield/Schnader as counsel for Bradford to provide services to assist counsel in advising client					
73	2001/06/11 - Letter from Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford regarding Schnader's engagement of Howard Lawson to provide professional services to assist counsel in advising JMI in connection with S-Corp election	A/C	Bradford; JMI (now owned by Philip Morris)	No	N/A	1, 8
74	1999/12/14 – Letter from Robert Siwicki (Howard Lawson) to Bruce Rosenfield, Esq., as counsel for Bradford, regarding Schnader's engagement of Howard Lawson to provide professional services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
75	2001/06/11 - Letter from	A/C	Bradford; JMI (now owned by	No	N/A	1, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford, regarding Schnader's engagement of Howard Lawson to provide professional services to assist counsel in advising JMI in connection with S-Corp election		Philip Morris)			
76	2001/06/11 - Letter from Robert Siwicki to Bruce Rosenfield, Esq., as counsel for Bradford regarding Schnader's engagement of Howard Lawson to provide professional services to assist counsel in advising JMI in connection with S-Corp election	A/C	Bradford; JMI (now owned by Philip Morris)	No	N/A	1, 8
77	2000/08/8 - Letter from T. Patrick Hurley of Howard Lawson to Bruce Rosenfield, Esq., as counsel for Bradford, re agreement for access to proprietary information of Bradford to provide professional services to assist counsel in	A/C	Bradford	No	N/A	1, 8

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	advising client.					
78	1999/12/14 – Letter from George Moorbury of Howard Lawson to Bruce Rosenfield, Esq., as counsel for Bradford, regarding Schnader's engagement of Howard Lawson to provide professional services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
99	2003/12/03 - Scott Barbakoff, Esq., and Larry Laubach, Esq., as counsel for Bradford and John in various capacities, handwritten notes all over face of document from John Stine (Ernst & Young) to Elizabeth Arias, Esq. (counsel for Ms. Hughes), re true-up for 1994 Anna Trust division, and attached internal communications and email from John S. Middleton to Larry Laubach, Esq. Clean copy of document to Ms. Arias	A/C	Bradford; John individually and in capacities as Bradford officer and Trustee of 1994 Anna Trusts	Yes – Barbakoff and Laubach notes relate to true-up of division of 1994 Anna Trust	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None

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	has been produced					
100	2001/04/3 Letter from Jeffery God, Esq., (Schnader, as counsel for Bradford and JMI) to Tish Why (JMI), cc: Larry Laubach, Esq. (as counsel for Bradford and JMI), regarding Articles and Certificates of Mergers re mergers of JMLP, Inc., John Middleton Company, and JMHC, Inc. into JMI	A/C	Bradford and/or JMI (now owned by Philip Morris)	No	N/A	None
101	2000/08/02 Letter from John S. Middleton to Bruce Rosenfield, Esq., as counsel for Bradford, re Howard, Lawson valuation	A/C	Bradford	No	N/A	1, 8
118	2008/11/19 – Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S. Middleton re gifting	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3
119	2008/11/19 - Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S. Middleton re gifting with	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3, 8

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	handwritten note					
120	2001/04/25 – document entitled “Frances Middleton Estate Planning Meeting” – agenda for meeting with Bruce Middleton, Esq., and Margaret Thompson, Esq., as counsel for Mrs. Middleton and John Stine/Ernst & Young, who were retained to provide services to assist attorney in providing estate planning advice.	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding her estate planning and/or planning as settlor of trusts	N/A	2, 3, 8
121	2008/11/19 - Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S. Middleton re gifting	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3, 8
122	2008/11/19 - Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S. Middleton re gifting	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3, 8
123	2009/05/28 – Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S.	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3, 8

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	Middleton re gifting					
124	2009/12/09 - Letter from Margaret Thompson, Esq., as counsel to Frances S. Middleton, to Frances S. Middleton re gifting and anticipated correspondence from Bruce Rosenfield, on behalf of Anna Nupson, regarding proposed 4% distributions from 1994 Anna Trust to Ms. Nupson	A/C – FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No as to portion relating to advice to Mrs. Middleton regarding annual gifts to children and grandchildren Yes as to portion of letter regarding anticipated correspondence from Bruce Rosenfield regarding the 1994 Anna Trust	N/A	3, 8
204	2002 - 2003 draft of Frances S. Middleton 2001 Agreement of Trust with John S. Middleton handwritten notes over the face of the document	A/C	John individually and in his capacity as Trustee and sole beneficiary of the Original 2001 GRAT	No – hand-written notes taken during negotiations, at time before Ms. Nupson became a beneficiary under the Modified 2001 GRAT	N/A	3, 8
208	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
213						
214						
215						
217	2002/11/22 - Fleet "Built in Gains Valuation of Certain Bradford Holdings, Inc. Subsidiaries as of February 1, 2001" prepared at request	A/C	Bradford	No	N/A	1, 8

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	of counsel to assist in providing legal advice to BHI.					
219	2000/11/28 – Ernst & Young document entitled "Supporting calculations for sub-chapter S memo of November 28, 2000," prepared to assist counsel in providing legal advice to BHI	A/C	Bradford	No	N/A	8
228	2002/10/14 – Larry Laubach email to John S. Middleton re communications with Michael Gunter	A/C	Bradford; John individually and as Trustee and sole beneficiary of the Original 2001 GRAT	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	3
236	2003/01/31 - email from John S. Middleton communication to Scott Barbakoff re shareholders.	A/C	Bradford	No	N/A	None
271	2003/01/31 - John S. Middleton communication to Scott Barbakoff re shareholders	A/C	Bradford	No	N/A	None
275	2000/08/11 - John S. Middleton communication to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
276	2000/06/14 - John S.	A/C	Bradford and Double Play, Inc.	No	N/A	1

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	Middleton email to Bruce Rosenfield, Esq., cc to Larry Laubach, Esq., both as counsel for Bradford and Double Play, re Howard Lawson					
277	2000/08/02 - John S. Middleton communication to Bruce Rosenfield Double Play, Inc.	A/C	Bradford	No	N/A	8
278	2000/08/02 - John S. Middleton communication to Larry Laubach and Bruce Rosenfield re request for review/comment on draft letter to Robert Siwicki	A/C	Bradford	No	N/A	1, 8
279	2001/03/11 - Bruce Rosenfield communication to John S. Middleton re redemption of Thorkelson and Flood stock	A/C	Bradford	No	N/A	8
281	2001/03/29 - John Stine communication to Bruce Rosenfield, John S. Middleton, Larry Laubach S-Corp reorganization, to assist counsel in providing legal advice to client	A/C	John Middleton individually; John as Trustee of November 1982 and 1/18/94 Grandchildren's Trusts for which Ms. Nupson is not a beneficiary; John as Trustee of 1994 Anna Trusts	No	A redacted version of this document <i>was</i> produced to Ms. Nupson, providing the portions of the communication regarding the 1994 Anna Trust The only remaining redactions	8

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	regarding impact on November 1982 trust (for which Ms. Nupson is not a beneficiary), January 1994 GST (for which Ms. Nupson is not a beneficiary) and 1994 Anna Trust				were of information pertaining only to personal information and/or accounts of John S. Middleton, Leigh P. Middleton, their children (John P. Middleton and Frances B. Middleton) and/or Trusts for their benefit.	
289	2000/08/31 - John S. Middleton communication to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
290	2000/06/14 - John S. Middleton email to Bruce Rosenfield, Esq., cc to Larry Laubach, Esq., both as counsel for Bradford and Double Play, re Howard Lawson	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8
291	2000/08/02 - John S. Middleton communication to Bruce Rosenfield re Robert Siwicki/Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
292	2000/08/02 - John S. Middleton communication to Larry Laubach and Bruce Rosenfield seeking	A/C	Bradford	No	N/A	1, 8

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	comments on attached draft letter to Robert Siwicki					
320	2002/01/30 – draft letter for review/comment by Bruce Rosenfield/Schnader Harrison Segal & Lewis re retention of Fleet Advisors to assist counsel in providing legal advice to client	A/C	Bradford	No	N/A	1, 8
321	2000/08/31 - John S. Middleton communication to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
322	2000/06/14 - John S. Middleton email to Bruce Rosenfield, Esq., cc to Larry Laubach, Esq., both as counsel for Bradford and Double Play, re Howard Lawson	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8
323	2000/08/02 - John S. Middleton communication to Bruce Rosenfield re Robert Siwicki/Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
324	2000/08/02 - John S. Middleton communication	A/C	Bradford	No	N/A	1, 8

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	to Larry Laubach and Bruce Rosenfield re Howard Lawson valuation					
325	2000/08/03 - draft John S. Middleton letter to Robert Siwicki for review and comment by Larry Laubach and Bruce Rosenfield	A/C	Bradford	No	N/A	1, 8
326	2000/10/06 - John S. Middleton email to Bruce Rosenfield with changes John S. Middleton wants communicated to R. Siwicki to draft valuation of Double Play	A/C	Bradford and Double Play	No	N/A	1, 8
340	2001/03/11 - Bruce Rosenfield communication to John S. Middleton re redemption of Thorkelson and Flood stock	A/C	Bradford	No	N/A	8
354	2003/01/31 – John S. Middleton email to Scott Barbakoff, Esq. re shareholders	A/C	Bradford	No	N/A	None
358	2001/08/31 - Bradford Letter agreement with Fleet Advisors regarding access to confidential Bradford	A/C	Bradford	No	N/A	1, 8

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	information in connection with engagement by Bruce Rosenfield/Schnader as counsel for Bradford to provide services to assist counsel in advising client					
359	2002/01/30 – draft of Fleet Advisors engagement letter for built in gains valuation for review/comment by John S. Middleton and counsel	A/C	Bradford	No	N/A	1
360	2002/01/30 – draft Fleet Advisors engagement letter for review/comment by Bruce Rosenfield	A/C	Bradford	No	N/A	1, 8
361	1999/12/03 – John S. Middleton email to Larry Laubach and Bruce Rosenfield re legal advice sought regarding possible corporate restructuring	A/C	Bradford	No	N/A	8
362	2000/08/31 – John S. Middleton letter to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
363	2000/06/14 - John S. Middleton email to Bruce Rosenfield, Esq., cc to Larry	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8

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	Laubach, Esq., both as counsel for Bradford and Double Play, re Howard Lawson					
364	2000/08/02 - John S. Middleton letter to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
365	2000/08/02 - John S. Middleton email to Larry Laubach and Bruce Rosenfield re review of draft letter to Robert Siwicki	A/C	Bradford	No	N/A	1, 8
366	2000/08/03 - draft John S. Middleton letter to Robert Siwicki for review and comment by Larry Laubach and Bruce Rosenfield	A/C	Bradford	No	N/A	1, 8
367	2000/10/06 - John S. Middleton email to Bruce Rosenfield with changes John S. Middleton wants communicated to R. Siwicki to draft valuation of Double Play	A/C	Bradford and Double Play	No	N/A	1, 8
368	2001/03/11 - Bruce Rosenfield communication to John S. Middleton re	A/C	Bradford	No	N/A	None

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	redemption of Thorkelson and Flood stock and planning					
372	2005/07/12 - Bruce Rosenfield letter to Frances S. Middleton re (a) estate planning, including (b) gifting to her grandchildren; (c) actions as settlor of 1998 Revocable Trust; (d) gifting to 1990 Trust for which Mrs. Middleton's three children are beneficiaries; and (e) trusts under the Modified 2001 GRAT f/b/o Lucia Hughes and John Middleton	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	3, 8
373	2005/07/12 - Bruce Rosenfield letter to Frances S. Middleton re (a) estate planning, including (b) gifting to her grandchildren; (c) actions as settlor of 1998 Revocable Trust; (d) gifting to 1990 Trust for which Mrs. Middleton's three children are beneficiaries; and (e) trusts under the	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	3, 8

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	Modified 2001 GRAT f/b/o Lucia Hughes and John Middleton, with Mrs. Middleton's handwritten notes					
374	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
375	2002 - Chart of "Frances Middleton Current Assets Available for Distribution" including assets held in 1972, 1982 and 1990 insurance trusts, Marital Trust, and Original 2001 GRAT, with Mrs. Middleton's handwritten notes, for discussion with Bruce Rosenfield regarding her estate planning	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	3, 8
376	2005/09/29 - Bruce Rosenfield letter to Frances S. Middleton re gift tax issues and gift to 4/18/1990 insurance trust	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	3, 8
377	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
385	2000/09/25 - Agenda for	A/C - FSM Executors	John Middleton and Lucia	No – document does not involve	N/A	2, 3, 8

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	Ernst & Young (John Stine) and Schnader (Bruce Rosenfield) meeting with Frances S. Middleton		Hughes as Executor and Executrix of the Estate of Frances S. Middleton	advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor		
386	2000/09/25 – Ernst & Young (John Stine) and Schnader (Bruce Rosenfield) Chart of estate planning techniques for France S. Middleton	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	2, 3, 8
388	2000/09/11 - John Stine letter to Frances re estate planning, to assist counsel (Bruce Rosenfield) in providing legal advice	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	2, 3, 8
389	2000/09/11 - Ernst & Young PowerPoint presentation re “Frances Middleton Estate Planning Strategies,” to assist counsel (Bruce	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves	N/A	2, 3, 8

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	Rosenfield) in providing legal advice			advice to Mrs. Middleton about her own estate planning and actions as a settlor		
390	2000/09/25 - Agenda for Ernst & Young (John Stine) and Schnader (Bruce Rosenfield) meeting with Frances S. Middleton	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	2, 3, 8
391	2000/09/25 – Ernst & Young (John Stine) and Schnader (Bruce Rosenfield) Chart of estate planning techniques for France S. Middleton	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and Executrix of the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	2, 3, 8
392	2008/11/19 - Margaret Thompson, Esq., letter to Frances S. Middleton re gifting	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – relates to advice to Mrs. Middleton regarding annual gifts to children and grandchildren	N/A	3, 8
393	2001/06/28 - Bruce Rosenfield letter to Frances S. Middleton, cc to John S. Middleton re “Estate Planning”	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves	N/A	2, 3, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
				advice to Mrs. Middleton about her own estate planning and actions as a settlor		
394	2001 – Draft of Original Grantor Retained Annuity Trust	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor	N/A	2, 3, 8
395	2003/03/25 - Schnader invoice re Frances S. Middleton	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves services to Mrs. Middleton in her capacity as settlor	N/A	2, 3, 8
396	2003/03/25 - Schnader invoice re Frances S. Middleton	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves services to Mrs. Middleton in her capacity as settlor	N/A	2, 3, 8
397	2005/09 Frances S. Middleton handwritten notes regarding discussions with	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S.	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of	N/A	2, 3, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Bruce Rosenfield		Middleton	a trust for which Ms. Nupson is a beneficiary		
398	Pre-2001 Undated Frances S. Middleton handwritten notes regarding discussions with Bruce Rosenfield regarding gifting issues	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves services to Mrs. Middleton in her capacity as settlor	N/A	2, 3, 8
399	Undated Frances S. Middleton handwritten notes re discussion with Bruce Rosenfield about estate planning	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves services to Mrs. Middleton in her capacity as settlor	N/A	2, 3, 8
400	2002/08/05 - Frances S. Middleton handwritten notes regarding discussions with Bruce Rosenfield on gifting issues and tax issues, Original 2001 GRAT, and 1994 Anna Trusts	A/C - FSM Executors	John Middleton as Executor and Lucia Hughes as Executrix for the Estate of Frances S. Middleton	No – document does not involve advice to Mrs. Middleton regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves services to Mrs. Middleton in her capacity as settlor	N/A	2, 3, 8
406	2000/06/14 - John S. Middleton email to Bruce Rosenfield, Esq., cc to Larry Laubach, Esq., both as counsel for Bradford and	A/C	Bradford and Double Play, Inc.	No	N/A	1, 8

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	Double Play, re Howard Lawson					
407	2000/08/02 - John S. Middleton letter to Bruce Rosenfield re Howard Lawson valuation	A/C	Bradford	No	N/A	1, 8
408	2000/08/02 - John S. Middleton email to Larry Laubach and Bruce Rosenfield re review of draft letter to Robert Siwicki	A/C	Bradford	No	N/A	1, 8
409	2000/08/03 - draft John S. Middleton letter to Robert Siwicki for review and comment by Larry Laubach and Bruce Rosenfield	A/C	Bradford	No	N/A	8
410	2000/10/06 - John S. Middleton email to Bruce Rosenfield with changes John S. Middleton wants communicated to R. Siwicki to draft valuation of Double Play	A/C	Bradford and Double Play	No	N/A	1, 8
411	2000/08/31 - John S. Middleton letter to Bruce Rosenfield cc to Donald Erickson of Ernst & Young re Howard Lawson	A/C	Bradford	No	N/A	1, 8

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	valuation; Ernst & Young included to provide services to assist counsel in providing legal advice to client					
412	2000/08 – John S. Middleton notes/comments to counsel re Robert Siwicki valuation	A/C	Bradford	No	N/A	1, 8
427	1999/05/18 - William Webb (Schnader) letter to John S. Middleton re transfer of BHI shares	A/C	Phillies Partnership	No	N/A	8
435	2000/08/08 - Confidentiality Agreement between Howard, Lawson & Co. and Schnader Harrison Segal & Lewis, addressed to Bruce Rosenfield and Larry Laubach. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
436	2001/08/31 – Letter agreement between Fleet Securities, Inc., and Bradford Holdings, Inc., signed by Robert Siwicki	A/C	Bradford	No	N/A	1, 8

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	and John S. Middleton. Participation of financial advisor required to assist in providing legal advice to client.					
438	2004/03/25 - Robert Siwicki letter to Larry Laubach regarding proprietary materials. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
439	2004/03/25 - Larry Laubach letter to Robert Siwicki regarding proprietary materials. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
440	2002/12/03 – John S. Middleton letter to Robert Siwicki regarding record retention. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
441	2002/11/26 – Robert Siwicki letter to John S.	A/C	Bradford	No	N/A	1, 8

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	Middleton regarding proprietary information. Participation of financial advisor required to assist in providing legal advice to client.					
443	2002/04/01 - Robert Siwicki letter to Bradford Holdings, Inc., re Fleet M&A Advisors' engagement for built-in gains evaluation. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
444	2002/04/01 - Addendum to letter listed above at No. 443	A/C	Bradford	No	N/A	1, 8
445	2002/11/22 - Fleet Advisors Built in Gains Valuation of BHI and Subsidiaries dated as of February 1, 2001, prepared at request of counsel (Bruce Rosenfield/Schnader Harrison) to assist in providing legal advice to client	A/C	Bradford	No	N/A	1, 8

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446	2002/11/22 - Fleet Advisors Built in Gains Valuation of BHI and Subsidiaries dated as of February 1, 2001, prepared at request of counsel (Bruce Rosenfield/Schnader Harrison) to assist in providing legal advice to client	A/C	Bradford	No	N/A	1, 8
447	2002/11/22 - Fleet Advisors Built in Gains Valuation of BHI and Subsidiaries dated as of February 1, 2001, prepared at request of counsel (Bruce Rosenfield/Schnader Harrison) to assist in providing legal advice to client	A/C	Bradford	No	N/A	1, 8
448	2002/04/01 – Robert Siwicki letter to Bruce Rosenfield regarding Fleet Securities, Inc., engagement for valuation of common shares of Bradford Holdings, Inc., to assist counsel in providing advice	A/C	Bradford	No	N/A	1, 8

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	to client, executed by Robert Siwicki, Bruce Rosenfield and John S. Middleton on behalf of Bradford Holdings, Inc.					
449	2002/04/01 – Robert Siwicki letter to Bruce Rosenfield regarding Fleet Securities, Inc., engagement for valuation of common shares of Bradford Holdings, Inc., to assist counsel in providing advice to client, executed by Robert Siwicki, Bruce Rosenfield and John S. Middleton on behalf of Bradford Holdings, Inc.	A/C	Bradford	No	N/A	1, 8
450	1999/12/14 - Robert Siwicki letter to Bruce Rosenfield regarding Howard Lawson & Co. engagement for valuation of common shares of Bradford Holdings, Inc., to assist counsel in providing advice to client, executed by Robert Siwicki, Bruce Rosenfield and John	A/C	Bradford	No	N/A	1, 8

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	S. Middleton on behalf of Bradford Holdings, Inc.					
451	2000/08/31 – John Stine (Ernst & Young) letter to Bruce Rosenfield regarding Arthur Andersen valuation of the Phillies, provided to assist counsel in providing legal advice to client	A/C	Bradford	No	N/A	None
452	1999/02/25- Howard Lawson & Co. report to Bruce Rosenfield regarding Valuation of Minority Interests of Common Stock of BHI as of 8/31/1998, provided to assist counsel in providing legal advice to client	A/C	Bradford	No	N/A	1, 8
453	2001/11/19 – John S. Middleton letter to Robert Siwicki re discussions with Thorkelsons and Smiths. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
454	2000/08/31 – John Stine (Ernst & Young) letter to	A/C	Bradford	No	N/A	None

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	Bruce Rosenfield regarding Arthur Andersen valuation of the Phillies, provided to assist counsel in providing legal advice to client					
455	2000/08/02 – John S. Middleton letter to Bruce Rosenfield regarding Arthur Andersen's October 31, 1999 valuation of the Phillies	A/C	Bradford/Double Play	No	N/A	8
456	2001/01/11 - Letter from Annette Madison to Robert Siwicki re valuation analysis to be done for S-Corp conversion. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
457	2002/04/17 – Larry Laubach letter to Robert Siwicki re Thorkelson/Smith purchase agreements. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
458	2001/04/17 - Larry Laubach letter to Robert Siwicki re	A/C	Bradford	No	N/A	1, 8

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	Thorkelson/Smith purchase agreements. Participation of financial advisor required to assist in providing legal advice to client.					
459	2002/04/03 – Larry Laubach letter to Robert Siwicki re Built-In Gains Valuation and confidentiality agreements. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
460	2002/05/14 - Clint Price (JMI) letter to Robert Siwicki re John Middleton, Inc. Participation of financial advisor required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
461	2002/01/25 - Clint Price (JMI) to Michael J. Burke of Fleet M&A Advisors re John Middleton, Inc., trademark information. Participation of financial advisor required to assist in providing legal advice to	A/C	Bradford	No	N/A	1, 8

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	client.					
463	2001/08/14 - Clint Price (JMI) letter to Robert Siwicki re information about John Middleton, Inc. Participation of financial advisor at request of counsel required to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
464	2001/01/11 - Robert Siwicki handwritten notes re telephone conference with Clint Price (JMI). Participation of financial advisor required at request of counsel to assist in providing legal advice to client.	A/C	Bradford	No	N/A	1, 8
467	2001/08/06 - Clint Price (JMI) List of Customer Rankings in Sales Dollars Feb 2000 - Jan 2001, with Robert Siwicki handwritten notes and	A/C	Bradford	No	N/A	1, 8

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	<p>2001/08/14 – Clint Price (JMI) John Middleton, Inc. List of Key Vendors for Manufacturing, with Robert Siwicki handwritten notes.</p> <p>Participation of financial advisor required to assist in providing legal advice to client.</p>					
468	<p>2001/08/14 - Clint Price communication, at request of counsel, to Robert Siwicki re valuation. Participation of financial advisor required to assist in providing legal advice to client.</p>	A/C	Bradford	No	N/A	1, 8
469	<p>2001/08/07 - Clint Price memorandum to Robert Siwicki re Environmental Analysis for John Middleton, Inc. Participation of financial advisor required to assist in providing legal advice to client.</p>	A/C	Bradford	No	N/A	1, 8
471	2002/01/10 - Lisa Haas	A/C	Bradford	No	N/A	1, 8

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	letter to Michael Burke of Fleet M&A Advisors re list of Mortgages, Notes and Revolving Credit Lines. Participation of financial advisor required to assist in providing legal advice to client.					
479	2013/11/05 – Margaret Thompson, Esq. communication to John Middleton regarding bequests and probate	A/C	John, serving as Executor for Estate of Frances S. Middleton; John as Trustee of the 1998 Revocable Trust of Frances S. Middleton; John as Trustee of the Marital Trust; John as Trustee of the 1/18/94 Grandchildren's Trusts f/b/o his children; John as Trustee of his own family trust; John as Trustee of the 1972, 1982 and 1990 insurance trusts	No as to portions of the document regarding the 1/18/94 Grandchildren's Trust f/b/o Mr. Middleton's children, or his own family trust. Yes as to portions of the document regarding administration for trusts and/or estates for which Ms. Nupson is a beneficiary.	Portions of the document relating to the 1998 Revocable Trust, the Marital Trust, or the 1972, 1982 and 1990 insurance trusts. Accordingly, a redacted version of this document was produced in the Orphans' Court Litigation with all portions relating to estate administration or the trusts for which Ms. Nupson is a beneficiary. The only portions withheld, following production of the redacted version of this document, relate to a trust created by Mr. Middleton for his children or the 1/18/94 "Grandchildren's Trust" created by HHM, Jr., and FSM	2, 3, 8

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					for Mr. Middleton's children.	
480	2014/04/28 – John Middleton communication to Margaret Thompson, Esq. regarding estate liabilities and demands by Ms. Nupson's counsel for information regarding distributions from Frances Middleton's estate	A/C	John, serving as Executor for Estate of Frances S. Middleton, and as Trustee of the 1998 Revocable Trust of Frances S. Middleton	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	2, 3, 7, 8
481	2015/01/21 – Communications between Margaret Thompson, Esq., James Mannion, Esq., Larry Laubach, Esq., and John Middleton regarding trust dispute	A/C and WP	John as Trustee of the 1994 Anna Trust	Yes	Yes – relates to active litigation with beneficiaries	7, 8
482	2014/12/07 - Communications between James Mannion, Esq. and Margaret Thompson, Esq. regarding litigation strategy	A/C and WP	John as Trustee of the 1994 Anna Trust	Yes	Yes – relates to active litigation with beneficiaries	7, 8
483	These documents were produced in unredacted form as part of the meet-and-confer process in the Orphans' Court Litigation.					
484						
492	2010/06/22 Larry Laubach email to John Middleton re negotiations with Ms. Nupson, Ms. Hughes and/or	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate	None

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	Ms. Hughes' counsel Jill Raspet re 1994 Anna Trust				counsel.	
500	2007/10/24 Brett Altman email to Philip Kircher and Larry Laubach (all of Cozen) re communications with and/or advice to clients re stock purchase agreement with Lucia Hughes individually, with attachment (listed below)	A/C	Bradford	No	N/A	None
501	2007/10/24 - Brett Altman comments on Stock Purchase Agreement with Lucia Hughes	A/C	Bradford	No	N/A	None
507	2010/09/09 John Middleton email to Larry Laubach re Ms. Nupson's, Ms. Hughes' and/or Ms. Hughes' counsel Jill Raspet's demands relating to the 1994 Anna Trust	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
508	2003/02/03 Larry Laubach email to James Jumper (both of Cozen) re shareholder records, with attachment (listed below)	A/C	Bradford	No – though attached document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None

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509	2003/02/03 - attachment to email listed above; document re shareholder records	A/C	Bradford	No – though document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None
521	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
522						
525	2004/04/07 John Middleton email to Larry Laubach re settlement agreement with Hughes family and remaining issues	A/C	Bradford; John, individually; John as trustee of the April 1990 insurance trust; John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. In addition, legal fees were not paid from trusts for which Ms. Nupson is a beneficiary	None
533	2010/08/04 Larry Laubach email to John S. Middleton re Bruce Rosenfield discussions with Ms. Nupson about her demands to modify and/or set aside 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Unclear whether attorneys' fees paid from trust of which Ms. Nupson is a beneficiary.	None
534	2010/07/20 John S. Middleton email to Larry	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of	None

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	Laubach re Ms. Hughes demands re the 1994 Anna Trust and Ms. Nupson's demands to modify or set aside 1994 Anna Trust				beneficiaries who were represented by separate counsel. Unclear whether attorneys' fees paid from trust of which Ms. Nupson is a beneficiary.	
538	2010/09/22 John Middleton email to Larry Laubach re discussions with Ms. Nupson, Mrs. Middleton, Ms. Hughes and/or Ms. Hughes' attorney Jill Raspet regarding distributions from 1994 Anna Trust and Ms. Nupson's demands to modify and/or set aside 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
539	2003/02/03 Larry Laubach email to James Jumper (both of Cozen) re discussions with and/or advice to John Middleton/Bradford about shareholder records, with attachment (listed below)	A/C	Bradford	Though attached document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None
540	2003/02/03 Larry Laubach document re shareholder records, attached to email above, for review/comment	A/C	A/C	Though attached document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record.	N/A	None

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	by James Jumper and John Middleton			Rather, it is a corporate record regarding all shareholders		
541	2010/12/14 Margaret Thompson email to Michael Heller and Larry Laubach (all of Cozen) re Cozen O'Conner attorneys' fees and status of accounting for 1994 Anna Trust	A/C and WP	Cozen O'Connor, P.C.	No – this is an internal Cozen O'Connor communication regarding its own policy.	N/A.	None
549	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
557	2004/04/07 John Middleton email to Larry Laubach re 2003 settlement agreement with Hughes family and remaining issues	A/C	Bradford; John, individually; John as trustee of the April 1990 insurance trust; John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. In addition, legal fees were not paid from trusts for which Ms. Nupson is a beneficiary	None
558	2010/06/01 Larry Laubach email to Margaret Thompson (both of Cozen) re discussions with John Middleton about Frances S. Middleton	A/C	John individually	No	N/A	8

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562	2010/04/15 John Middleton email to Larry Laubach re Ms. Nupson's demands to modify or set aside 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
563	2010/09/22 John Middleton email to Larry Laubach re Frances S. Middleton gifts to Hughes children	A/C	John individually	No	N/A	None
568	2002/09/26 Larry Laubach email to Richard Silpe (both of Cozen) re discussions with and/or advice to John Middleton about possible amendments to Bradford shareholder's agreement, attachment listed below.	A/C	Bradford; John individually	No – shareholder's agreement is a corporate governance document	N/A	None
569	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
582	2010/09/22 Larry Laubach email to John Middleton re discussions with Ms. Nupson and/or her counsel Bruce Rosenfield, and Ms. Hughes and/or her counsel Jill Raspet regarding distributions from the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None

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583	2010/06/15 Larry Laubach email chain with John S. Middleton re Ms. Hughes' and/or her counsel's demands relating to the 1994 Anna Trust, and discussions regarding construction of agreement with Altria	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
585	2003/01/31 John Middleton memorandum to Scott Barbakoff (attached to email listed above) re information from Bradford about shareholders	A/C	Bradford	No	N/A	None
589	2004/04/07 Larry Laubach email to John Middleton re settlement with Hughes family and remaining issues	A/C	Bradford; John, individually; John as trustee of the April 1990 insurance trust; John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. In addition, legal fees were not paid from trusts for which Ms. Nupson is a beneficiary	None
592	2010/07/20 John Middleton email to Larry Laubach re Ms. Nupson's, Ms. Hughes'	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	and/or their respective counsel's demands relating to 1994 Anna Trust				represented by separate counsel.	
593	2003/01/31 Email from John S. Middleton to Larry Laubach re: shareholders (with attachment listed below)	A/C	Bradford	No	N/A	None
594	2003/01/31 document from John Middleton to Larry Laubach re shareholders (attachment to above)	A/C	Bradford	No	N/A	None
596	2001/02/01 Fleet Securities letter to Bruce Rosenfield re Fleet engagement	A/C	Bradford	No	N/A	1
597	2010/07/14 John Middleton email to Larry Laubach re discussions with Ms. Nupson, Ms. Hughes and/or their respective counsel re Ms. Nupson's demands relating to the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
598	2003/02/03 John Middleton email to Larry Laubach re shareholders, with attachment listed below	A/C	Bradford	No	N/A	None
599	2003/02/03 John Middleton	A/C	Bradford	No	N/A	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	draft document re shareholders for review/comment by Larry Laubach					
600	2010/04/14 Larry Laubach email to John S. Middleton re discussions with Lucia Hughes' counsel regarding Ms. Hughes' and Ms. Nupson's demands relating to the 1994 Anna Trust	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
601	2003/02/18 Larry Laubach email to James Jumper, Scott Barbakoff (all of Cozen) and John Middleton re discussions with Ms. Hughes' counsel	A/C	Bradford; John as Trustee of the 1/18/94 Grandchildren's Trust, 1994 Anna Trust, Original 2001 GRAT and proposed Modified 2001 GRAT	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
604	2003/02/11 John Middleton email to Larry Laubach re confidentiality agreement with and discussions with counsel for Hughes sons, with attachment listed below	A/C	Bradford	No	N/A	None
605	2003/02/11 John Middleton comments on draft letter to counsel for Hughes sons	A/C	Bradford	No	N/A	None
606	2003/02/03 John Middleton email to Larry Laubach re	A/C	Bradford	No	N/A	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	shareholders, with attachment listed below					
607	2003/02/03 John Middleton document re shareholders for review/comment by Larry Laubach	A/C	Bradford	No – document is a corporate record regarding all shareholders	N/A	None
608	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
613						
615	2010/09/09 Larry Laubach email to John Middleton re discussions with Ms. Nupson and/or Ms. Hughes' attorney about their demands re 1994 Anna Trust	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. It is unclear whether legal fees were paid from trusts of which Ms. Nupson was a beneficiary.	None
617	2004/04/07 Larry Laubach email to John Middleton re settlement with Hughes family and remaining issues	A/C	Bradford; John, individually; John as trustee of the April 1990 insurance trust; John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. In addition, legal fees were not paid from trusts for which Ms. Nupson is a beneficiary	None
620	2005/09/16 Larry Laubach letter to John Middleton re	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	true-up for 1994 Anna Trust				beneficiaries who were represented by separate counsel	
621	2010/06/22 John Middleton email to Larry Laubach re discussions with Ms. Nupson, Ms. Hughes and/or their counsel about demands regarding the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel	None
622	2010/09/09 Larry Laubach email to John Middleton re discussions with Ms. Nupson, Ms. Hughes and/or their counsel about demands regarding the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel	None
627	2010/07/20 Larry Laubach email to John Middleton re discussions with Ms. Nupson, Ms. Hughes and/or their attorneys regarding the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel	None
634	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
649	2010/05/13 John Middleton email to Larry Laubach re response to written demand by Jill Raspet, counsel for Ms. Hughes, and Ms.	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Nupson's position re 1994 Anna Trust					
652	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
653						
657	2010/05/13 Larry Laubach email to John Middleton re response to letter from Jill Rapset, counsel for Ms. Hughes, regarding Ms. Hughes' and Ms. Nupson's positions relating to the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
659	2010/09/09 John Middleton email to Larry Laubach re Ms. Nupson's, Ms. Hughes' and/or Ms. Hughes' counsel Jill Raspet's demands relating to the 1994 Anna Trust	A/C and WP	John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
663	2010/09/14 Larry Laubach email to John Middleton re discussions with Ms. Nupson and/or Ms. Hughes (or her counsel) about their positions relating to the 1994 Anna Trust	A/C and WP	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
666	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
681	2003/02/18 Larry Laubach email to James Jumper, Scott Barbakoff (all of Cozen) and John Middleton re discussions with Ms. Hughes' counsel	A/C	Bradford; John as Trustee of the 1/18/94 Grandchildren's Trust, 1994 Anna Trust, Original 2001 GRAT and proposed Modified 2001 GRAT	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
682	2001/02/21 John Middleton email to Larry P. Laubach re Nancy Smith and Susan Thorkelson	A/C	Bradford	No	N/A	None
684	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
688	2003/01/31 – John S. Middleton email to Scott Barbakoff, Esq. re shareholders (attachment to email listed above)	A/C	Bradford	No	N/A	None
697	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
698						
699						
715	2003/10/07 John Stine email to Larry Laubach re discussion with Ms. Hughes counsel, E. Arias, re calculations for true-up of 1994 Anna Trust division	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
717	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
718						

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
730						
731						
740						
744						
745						
754	2001/02/22 Larry Laubach draft stock purchase agreement for Bradford and Susan Thorkelson. Electronic file named “bradford - stock purchase agreement of susan flood thorkelson v1.WPD”	A/C	Bradford	No	N/A	8
755	2001/02/22 Larry Laubach draft stock purchase agreement for Bradford and Nancy Smith. Electronic file named “bradford - stock purchase agreement of nancy f. smith (2).WPD”	A/C	Bradford	No	N/A	8
756	2001/02/22 Larry Laubach draft stock purchase agreement for Bradford and Susan Thorkelsen” red-lined. Electronic file named “bradford - stock purchase agreement of susan f.	A/C	Bradford	No	N/A	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	thorkelson vRED (3).WPD”					
757	This document was produced in unredacted form as part of the meet and confer process in the Orphans’ Court Litigation					
761	2002/09/28 Larry Laubach email to John Stine (E&Y, financial advisor required to provide legal advice to client) re attached settlement proposal as provided to Bruce Rosenfield. Note this email is a duplicate of the document listed at No. 548, and the attachment (which is duplicate of entry No. 549) is non-privileged and has been produced at BHICOZ027904	A/C	Bradford; John individually; John as Trustee and sole beneficiary of the Original 2001 GRAT; John as Trustee of the 1/18/94 Grandchildren’s Trust; John as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
767	This document was produced in unredacted form as part of the meet and confer process in the Orphans’ Court Litigation					
775	2003/01/29 Larry Laubach email to John Middleton regarding Ms. Hughes’ response to settlement proposal	A/C	Bradford; John individually; John as Trustee and sole beneficiary of Original 2001 GRAT; John as Trustee of 1/18/94 Grandchildren’s Trust	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	None
781	2003/01/31 John S. Middleton email with Larry Laubach regarding addresses for shareholders	A/C	Bradford; John individually; John as Trustee of the Anna 1994 Trusts; John as sole beneficiary and Trustee of the Original 2001 GRAT; John as Trustee of the proposed	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
			Modified 2001 GRAT; John as Trustee of the 1994 Grandchildren's Trusts			
782	2003/01/31 document from John Middleton to Scott Barbakoff re shareholders	A/C	Bradford	No – document is a corporate record regarding all shareholders	N/A	None
783	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
786	2003/02/18 Larry Laubach email to Phyllis Calix re revised document received from Ms. Hughes' counsel	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
791	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
838						
839	2003/02/03 John Middleton email to Larry Laubach re shareholders, with attachment listed below	A/C	Bradford	No	N/A	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
840	2003/02/03 John Middleton draft document re shareholders for review/comment by Larry Laubach	A/C	Bradford	No – document is a corporate record regarding all shareholders	N/A	None
842	These documents were produced in unredacted form as part of the meet and confer process in the Orphans’ Court Litigation					
847						
848	2003/02/18 James Jumper email to Larry P. Laubach with included email of the same date from Larry Laubach to John Middleton, James Jumper and Scott Barbakoff (all of Cozen) re Ms. Hughes’ counsel’s revisions to Exhibit 2 (Acknowledgement of Receipt of Funds) to Family Settlement Agreement for 1/18/94 Grandchildren’s Trust	A/C	John as Trustee of the 1/18/94 Grandchildren’s Trust	No	N/A	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
850	2003/01/31 John Middleton memorandum to Scott re information from Bradford about shareholders	A/C	Bradford	No	N/A	None
859	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
862						
863						
867	2003/02/05 Laubach email to Phyllis Calix re instructions relating to Family Settlement Agreement re 1994 Anna Trust	A/C	John, individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	Non
882	2003/02/18 Scott Barbakoff email to Larry Laubach and Phyllis Calix (all of Cozen) re communications with and/or advice to client re signatory authority, with attachment (listed below)	A/C	Bradford; John individually; John as Trustee of the 1994 Anna Trust; John as Trustee of the 1/18/94 Grandchildren's Trust; John as Trustee and sole beneficiary of the Original 2001 GRAT; John as Trustee of the then-proposed Modified 2001 GRAT	Yes, at least as to the portions of the attachments relating to the 1994 Anna Trust and/or the Modified 2001 GRAT. No as to other portions of the attachments that relate to other trusts.	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. N/A	None
883	2003/02/18 Scott Barbakoff document attached to email listed above - revised document re signatures/executions	A/C	Bradford; John individually; John as Trustee of the 1994 Anna Trust; John as Trustee of the 1/18/94 Grandchildren's Trust; John as Trustee and sole	Yes, at least as to the portions of the attachments relating to the 1994 Anna Trust and/or the Modified 2001 GRAT.	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
			beneficiary of the Original 2001 GRAT; John as Trustee of the then-proposed Modified 2001 GRAT	No as to other portions of the attachments that relate to other trusts	N/A	
884	2003/02/03 Larry Laubach email to James Jumper (both of Cozen) re shareholder records, with attachment (listed below)	A/C	Bradford	No – though attached document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None
885	2003/02/03 - attachment to email listed above; document re shareholder records	A/C	Bradford	No – though document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None
887	2003/02/03 John Middleton email to Larry Laubach re shareholders, with attachment listed below	A/C	Bradford	No	N/A	None
892	2003/02/03 Larry Laubach email to James Jumper (both of Cozen) re shareholder records, with attachment (listed below)	A/C	Bradford	No – though attached document refers to 1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders	N/A	None
893	2003/02/03 - attachment to	A/C	Bradford	No – though document refers to	N/A	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	email listed above; document re shareholder records			1994 Anna Trust as shareholder, document itself is not a trust administration record. Rather, it is a corporate record regarding all shareholders		
906	2003/02/12 Scott Barbakoff email to Larry Laubach and Phyllis Calix (all of Cozen) re communications with and/or advice to client re signatory authority, with attachment (listed below)	A/C	Bradford; John individually; John as Trustee of the 1994 Anna Trust; John as Trustee of the 1/18/94 Grandchildren's Trust; John as Trustee and sole beneficiary of the Original 2001 GRAT; John as Trustee of the then-proposed Modified 2001 GRAT	Yes, at least as to the portions of the attachments relating to the 1994 Anna Trust and/or the Modified 2001 GRAT. No as to other portions of the attachments that relate to other trusts	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. N/A	None
907	2003/02/12 Scott Barbakoff document attached to email listed above - revised document re signatures/executions	A/C	Bradford; John individually; John as Trustee of the 1994 Anna Trust; John as Trustee of the 1/18/94 Grandchildren's Trust; John as Trustee and sole beneficiary of the Original 2001 GRAT; John as Trustee of the then-proposed Modified 2001 GRAT	Yes, at least as to the portions of the attachments relating to the 1994 Anna Trust and/or the Modified 2001 GRAT. No as to other portions of the attachments that relate to other trusts	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
908	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
909						
921						

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
922						
923						
924	2014/05/19 Emails among John Middleton, Nadine Doolittle (Schnader) and Bruce Rosenfield re John and Leigh Middleton's personal estate planning and demands from T. Mucci (counsel for Ms. Nupson) regarding accounting	A/C and WP	John and Leigh Middleton individually as to communications regarding their personal estate planning; John Middleton, individually and as Trustee of the Anna 1994 Trusts as to demands from T. Mucci	No as to portions relating to John and Leigh Middleton's estate planning (such portions are non-responsive) Yes as to portions relating to communications with T. Mucci	As part of the meet and confer process in Orphans' Court, this document was produced in redacted form to provide the information relating to communications with Mr. Mucci. The only remaining redacted information pertains to the personal estate planning of John S. Middleton.	8
925	2014/06/05 Communication from Rosemary Maher (Schnader) to Bruce Rosenfield re discussion with Larry Laubach and John Middleton regarding legal arguments of Anna Nupson and claim that her assignment was revocable.	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary.	6, 7, 8
926	2014/06/04 Email among Bruce Rosenfield, John Middleton, Larry Laubach and Rosemary Maher re legal arguments of Anna Nupson and claim that her	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary.	6, 7, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	assignment was revocable.					
927	2014/05/29 Memorandum from Michael Williams (Schnader) to Nadine Doolittle, Wilbur Kipnes (Schnader) and Bruce Rosenfield re advice for client regarding validity of Ms. Nupson's 1998 Assignment	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary.	6, 8
928	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
929						
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938	2010/09/22 Larry Laubach email to John Middleton re Ms. Nupson's and/or her counsel's demands relating to the 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
939	2010/04/14 Larry Laubach email to John S. Middleton	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	re discussions with Lucia Hughes' counsel regarding Ms. Hughes' and Ms. Nupson's demands relating to the 1994 Anna Trust				beneficiaries who were represented by separate counsel.	
940	2010/09/09 John Middleton email to Larry Laubach re negotiations with Ms. Nupson, Ms. Hughes and/or Ms. Hughes' counsel Jill Raspet re 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
941	2009/01/06 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or Ms. Hughes regarding Ms. Nupson's position re the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
942	2010/01/07 John S. Middleton email to Larry P. Laubach re discussions with Lucia Hughes' counsel regarding Ms. Hughes' and Ms. Nupson's demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
943	2010/01/07 John S. Middleton email to Larry P.	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Laubach re discussions with Lucia Hughes' counsel regarding Ms. Hughes' and Ms. Nupson's demands relating to the 1994 Anna Trust				beneficiaries who were represented by separate counsel.	
944	2010/01/07 Larry P. Laubach email to John Middleton re discussions with Lucia Hughes' counsel regarding Ms. Hughes' and Ms. Nupson's demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
945	2014/06/06 Bruce Rosenfield email to Larry P. Laubach; John S. Middleton re discussions with Thomas Mucci regarding Ms. Nupson's and Ms. Hughes' competing positions regarding assignment of insurance trust proceeds to 1994 Anna Trust	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	8
946	2014/06/06 Larry P. Laubach email to Bruce Rosenfield; John S. Middleton re discussions	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	with Thomas Mucci regarding Ms. Nupson's and Ms. Hughes' competing positions regarding assignment of insurance trust proceeds to 1994 Anna Trust		Trusts		counsel. Litigation threatened by beneficiary. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	
947	2014/06/06 John S. Middleton email to Larry P. Laubach; Bruce Rosenfield, Esq. re discussions with Thomas Mucci regarding Ms. Nupson's and Ms. Hughes' competing positions regarding assignment of insurance trust proceeds to 1994 Anna Trust	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	8
948	2014/06/06 Bruce Rosenfield email to John Middleton ; Larry P. Laubach re discussions with Thomas Mucci regarding Ms. Nupson's and Ms. Hughes' competing positions regarding assignment of insurance trust proceeds to 1994 Anna	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation threatened by beneficiary. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Trust					
949	2014/11/05 Draft email from Larry Laubach to John Middleton regarding Ms. Nupson's counsel's demand to inspect records relating to the 1994 Anna Trust and Bradford corporate information	A/C and WP	Bradford; John Middleton, individually	No – relates to request to view corporate documents only	As part of the meet and confer process in Orphans' Court, a redacted version of the document was produced to provide information related to the 1994 Anna Trust. The only information still withheld is privileged documents relating to a demand to inspect corporate records made at a time when Ms. Nupson was no longer a direct or indirect shareholder.	8
950	2014/12/31 James Mannion email to John Middleton regarding Ms. Nupson's claim that Mannion Prior was disqualified from representing Mr. Middleton in the pending litigation, with attached draft letter (listed below) for review and comment by Mr. Middleton	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the 1990 Trust, and the Anna 1994 Trusts	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Litigation pending. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	8
951	2014/12/30 James Mannion draft letter to Joel Young (Ms. Nupson's counsel)	A/C and WP	John Middleton, individually and as Trustee of the 1972 Trust, the May 1982 Trust, the	Yes	Interests of John as trustee differed from interests of beneficiaries who were	8

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	regarding Ms. Nupson's claim that Mannion Prior was disqualified from representing Mr. Middleton in the pending litigation, for review and comment by Mr. Middleton		1990 Trust, and the Anna 1994 Trusts		represented by separate counsel. Litigation pending. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	
952	2010/09/28 Larry P. Laubach email to John Middleton re negotiations with Ms. Nupson, Ms. Hughes and/or Ms. Hughes' counsel Jill Raspet re 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
953	2008/07/02 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or Frances S. Middleton (or their counsel) regarding Ms. Nupson's and/or Ms. Hughes' demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
954	2009/09/14 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her counsel regarding Ms.	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Nupson's and/or Ms. Hughes' disagreement regarding distributions from the 1994 Anna Trust					
955	2010/06/18 John S. Middleton email to Larry P. Laubach re negotiations with Ms. Nupson, Ms. Hughes and/or Ms. Hughes' counsel Jill Raspet re 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. It is unclear whether legal fees were paid from a trust of which Ms. Nupson was a beneficiary.	None
956	2011/02/23 John S. Middleton email to Larry P. Laubach re Ms. Nupson's desire to have Jonathan Freund review setting aside or modifying the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
957	2011/02/23 John S. Middleton email to Larry P. Laubach re Ms. Nupson's desire to have Jonathan Freund review setting aside or modifying the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
958	2011/02/23 Larry P. Laubach email to John	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of	None

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Middleton re Ms. Nupson's desire to have Jonathan Freund review setting aside or modifying the 1994 Anna Trust				beneficiaries who were represented by separate counsel.	
959	2011/02/23 Larry P. Laubach email to John Middleton re Ms. Nupson's desire to have Jonathan Freund review setting aside or modifying the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
963	2009/09/14 John S. Middleton email to Larry P. Laubach re Ms. Nupson's demands to modify the 1994 Anna Trust and proposed revisions to trust documents	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
964	2009/09/14 Larry P. Laubach email to John Middleton re Ms. Nupson's demands to modify the 1994 Anna Trust and proposed revisions to trust document	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
965	2010/08/16 Larry P. Laubach email to John Middleton re negotiations with Ms. Nupson, Ms.	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate	None

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	Hughes and/or Ms. Hughes' counsel Jill Raspet re 1994 Anna Trust				counsel.	
966	2008/06/27 John S. Middleton email to Larry P. Laubach re negotiations with Ms. Hughes and/or Ms. Nupson re 1994 Anna Trust and his resignation as trustee	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
967	2008/06/26 Larry P. Laubach email to John Middleton re negotiations with Ms. Hughes and/or Ms. Nupson re 1994 Anna Trust and his resignation as trustee	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
968	2008/06/24 John S. Middleton email to Larry P. Laubach re discussions with Ms. Nupson and/or Frances S. Middleton (or their counsel) regarding Ms. Nupson's and/or Ms. Hughes' demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
969	This document was produced in unredacted form as part of the meet-and-confer process in the Orphans' Court Litigation					
970	2008/06/27 Larry P. Laubach email to John Middleton re negotiations	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were	None

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	with Ms. Hughes and/or Ms. Nupson re 1994 Anna Trust and his resignation as trustee				represented by separate counsel.	
971	2008/06/24 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or Frances S. Middleton (or their counsel) regarding Ms. Nupson's and/or Ms. Hughes' demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
972	2008/06/24 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or Frances S. Middleton (or their counsel) regarding Ms. Nupson's and/or Ms. Hughes' demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
973	2009/01/30 John Stine (Smart & Associates) email to John S. Middleton, Larry P. Laubach and William Marx (Smart & Associates) re accounting for 1994 Anna Trust (numbered paragraph	A/C	John as Trustee of the 1994 Anna Trust as to paragraph 1 John individually and/or Bradford as to numbered paragraphs 2 to 5	No	Paragraph 1 of the document relating to 1994 Anna Trust was produced in the Orphans' Court Litigation. The only remaining redacted portions relate to company	None

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	1) and issues relating to salary/ bonuses/ distributions for the company (numbered paragraphs 2 to 5)				matters long after the 2003 stock redemption.	
974	2009/02/27 John S. Middleton email to Larry P. Laubach re discussions about Frances S. Middleton and her estate planning	A/C	John individually	No – relates solely to communications about Mrs. Middleton and not any trusts of which Ms. Nupson is a beneficiary.	N/A	2, 3
975	2011/07/01 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson's attorney Jonathan Freund about the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel..	None
977	2011/07/08 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson's attorney John Stoviak about the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
978	2011/07/08 John S. Middleton email to Larry P. Laubach re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None

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	1994 Anna Trust					
979	2011/07/08 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
980	2011/07/12 John S. Middleton email to Larry P. Laubach re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
981	2011/07/12 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
982	2011/07/12 John S. Middleton email to Larry P. Laubach re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None

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	1994 Anna Trust					
983	2011/07/13 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her attorney Jonathan Freund re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
984	2011/07/18 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her attorneys Jonathan Freund and John Stoviak re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
985	2011/09/26 Larry P. Laubach email to John Middleton re discussions with Ms. Nupson and/or her attorney John Stoviak re her demands relating to the 1994 Anna Trust and trust disbursements and Ms. Hughes' position re same.	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
986	2011/10/03 Larry P. Laubach email to John Middleton re discussions	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were	7

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	with Ms. Nupson and/or her attorneys Jonathan Freund and John Stoviak re her demands relating to the 1994 Anna Trust				represented by separate counsel..	
987	2011/10/03 John S. Middleton email to Larry P. Laubach re discussions with Ms. Nupson and/or her attorneys Jonathan Freund and John Stoviak re her demands relating to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
989	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
993						
994	2012/09/28 Larry P. Laubach email to John S. Middleton re calculation of potential gifts from Frances S. Middleton's 1998 Revocable Trust, with attachment listed below	A/C	John individually	No	N/A	2, 3
995	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
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1011						
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1013						
1014						
1015						
1016	2012/12/22 John Stine (Grant Thornton) email to John S. Middleton and Larry P. Laubach re gifts from Marital Trust	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	8
1044	2012/12/23 John Stine (Grant Thornton), Larry P. Laubach, James Mannion email to John S. Middleton; and Jared Szychter; John Stine (Grant Thornton) re negotiations with Ms. Hughes, Ms. Nupson and/or their respective counsel regarding 2012 Family Settlement Agreement, with attachment listed below	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4
1045	2012/12/23 John Stine document for review/comment by Larry Laubach, James Mannion and John Middleton regarding assets of Frances S. Middleton. Electronic file named "Analysis of	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4

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	12.17 portfolios.v2.5mm.wscenario summary.v2 12.23.12.xlsx”					
1046	2012/12/23 Larry P. Laubach, John S. Middleton, Margaret Thompson email to James Mannion re negotiations with Ms. Hughes, Ms. Nupson and/or their respective counsel regarding 2012 Family Settlement Agreement, with attachment listed below	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4
1047	2012/12/23 Draft Family Settlement Agreement with edits by James Mannion, for review/comment by Margaret Thompson, John Middleton. Electronic file named “PHILADELPHIA-#6794714-v6-MIDDLETON_2012_FAMILY_AGREEMENT JFM EDITS 12 23 12.DOCX”	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4
1048	2012/12/23 John S. Middleton, John Stine email to James Mannion and Larry	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H.	No	Interests of John as trustee differed from interests of beneficiaries who were	2, 3, 4

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	P. Laubach re 2012 Family Agreement		Middleton, Jr.		represented by separate counsel.	
1052	2012/12/24 John Stine (Grant Thornton) email to John S. Middleton and Larry P. Laubach re attached document, listed below, for 2012 Family Settlement Agreement	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4
1053	2012/12/24 John Stine document for review/comment by John Middleton and Larry Laubach, attached to email listed above. Electronic file named "12.24.12 Trustee Authorization to transfer assets exhibit.pdf"	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4
1055	2012/12/24 Larry P. Laubach email to John S. Middleton re 2012 Family Settlement Agreement and instructions to Hayes Roberts at Tiedemann to sell securities of Revocable Trust	A/C and WP	John individually and as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr.	No	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	2, 3, 4

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1060	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1061						
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1081	2013/12/11 Margaret Thompson email to John S. Middleton and Larry P. Laubach re Estate of Francis Middleton and demands on behalf of Ms. Nupson by Thomas Mucci relating to same.	A/C and WP	John as Executor of the Estate of Frances S. Middleton, as Trustee of the Marital Trust under the Will of Herbert H. Middleton, Jr., and as Trustee of the 1998 Revocable Trust	No	Litigation threatened by beneficiary. As part of the meet and confer process, the document was produced in redacted form.	2, 3, 7, 8
1082	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1083						
1084						

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1085	2013/11/05 Attachment to email listed above. Memorandum from Margaret Thompson to John Middleton regarding Estate and Trust of Frances S. Middleton. Electronic file named "LEGAL 17594867v1 Middleton e-memo to John Middleton.pdf"	A/C	John individually as to numbered paragraph 8 of the attachment regarding his individual disclaimer rights	No	A redacted version of this document was produced in the Orphans' Court Litigation. The only information still withheld relates to legal advice to John Middleton regarding his legal rights as a beneficiary of his mother's Revocable Trust / estate.	2, 3, 8
1086	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1087						
1088						
1089						
1090	2014/05/20 Bruce Rosenfield email to John S. Middleton and Larry P. Laubach re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1091	2014/05/20 John S. Middleton emails with Bruce Rosenfield and Larry P. Laubach re demands of Ms. Nupson relating to	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened	8

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	assignment of insurance trust distributions to 1994 Anna Trust				by beneficiary.	
1092	2014/05/20 Bruce Rosenfield emails with John S. Middleton and Larry P. Laubach re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1093	2014/05/20 John S. Middleton emails with Bruce Rosenfield and Larry P. Laubach re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1094	2014/05/20 Bruce Rosenfield emails with John S. Middleton and Larry P. Laubach re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1095	2014/06/04 Bruce	A/C and WP	John as Trustee of the 1972,	Yes	Interests of John as trustee	8

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	Rosenfield email to John S. Middleton and Larry P. Laubach; Margaret Thompson; Rosemary Maher (Schnader) re research for response to demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust, with attachment listed below		May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually		differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	
1096	2014/05/29 Michael S. Williams memorandum (attached to email listed above) to Wilbur Kipnes Nadine Doolittle and Bruce Rosenfield (all from Schnader) regarding Validity of Anna Nupson's 1998 Assignment. Electronic file named "Memo re Validity of Anna Nupson's 1998 Assignment.DOCX"	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1097	2014/06/04 Larry P. Laubach email to Bruce Rosenfield; John S. Middleton and Rosemary	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate	8

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	Maier (Schnader) re research for response to demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust		Trust; John individually		counsel; litigation threatened by beneficiary.	
1098	2014/06/04 Larry P. Laubach email to Bruce Rosenfield; John S. Middleton and Rosemary Maier (Schnader) re research for response to demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1099	2014/06/05 John S. Middleton email to Bruce Rosenfield; Larry P. Laubach and Rosemary Maier (Schnader) re research for response to demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1100	2014/06/05 Bruce Rosenfield email to John	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990	Yes	Interests of John as trustee differed from interest of	8

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	Middleton ; Larry P. Laubach and Rosemary Maher (Schnader) re research for response to demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust		insurance trusts; John as Trustee of the 1994 Anna Trust; John individually		beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	
1101	2014/06/05 Larry P. Laubach email to John S. Middleton; Bruce Rosenfield re discussions with Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1102	2014/06/06 Larry P. Laubach email to John Middleton and Bruce Rosenfield re attached draft letter (listed below) to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1103	2014/06/06 Larry Laubach	A/C and WP	John as Trustee of the 1972,	Yes	Interests of John as trustee	8

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	draft letter (attachment to email listed above) for review/comment by John Middleton and Bruce Rosenfield, to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust. Electronic file named "LEGAL 19315292v1 Letter to Thomas J. Budd Mucci.DOCX"		May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually		differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	
1104	2014/06/08 Bruce Rosenfield email to Larry P. Laubach and John Middleton re attached draft letter (listed below) to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1105	2014/06/08 Bruce Rosenfield revisions of Larry Laubach draft letter (attachment to email listed	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate	8

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	above) for review/comment by John Middleton and Bruce Rosenfield, to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust, attached to email listed above. Electronic file named "LEGAL 19315292v1 Letter to Thomas J. Budd Mucci.DOCX"		Trust; John individually		counsel; litigation threatened by beneficiary.	
1106	2014/06/09 Larry P. Laubach email to Bruce Rosenfield and John Middleton re draft letter to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary. In addition, legal fees not paid from trusts of which Ms. Nupson is a beneficiary	8
1107	2014/06/09 John S. Middleton email to Larry P. Laubach; Bruce Rosenfield re draft letter to Thomas Mucci re demands of Ms. Nupson relating to	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8

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	assignment of insurance trust distributions to 1994 Anna Trust					
1108	2014/06/09 Larry P. Laubach email to John S. Middleton; Bruce Rosenfield re revised letter to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust, with two attachments listed below	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1109	2014/06/09 Larry Laubach revisions to draft letter to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust, blackline draft, for review/comment by Bruce Rosenfield and John Middleton. Electronic file named "[Comparison Result] Letter to Thomas J. Budd Mucci (compared with Letter to Thomas J. Budd	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8

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	Mucci-1).pdf'					
1110	2014/06/09 Larry Laubach revised draft letter to Thomas Mucci re demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust, for review/comment by Bruce Rosenfield and John Middleton. Electronic file named "[Modified Document] Letter to Thomas J. Budd Mucci.docx"	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1111	2014/06/10 Larry P. Laubach email to Bruce Rosenfield; John S. Middleton re discussions with Thomas Mucci about demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1112	2014/06/11 Bruce Rosenfield email to Larry P. Laubach; John S. Middleton re letter re distributions to	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate	8

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	Ms. Nupson from 1972, May 1982 and April 1990 insurance trusts		Trust; John individually		counsel; litigation threatened by beneficiary.	
1113	2014/06/11 John S. Middleton email to Bruce Rosenfield; Larry P. Laubach re letter re distributions to Ms. Nupson from 1972, May 1982 and April 1990 insurance trusts	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1114	2014/06/11 Bruce Rosenfield email to John Middleton ; Larry P. Laubach re letter re distributions to Ms. Nupson from 1972, May 1982 and April 1990 insurance trusts	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	8
1115	2014/06/24 John S. Middleton email to Larry P. Laubach; Bruce Rosenfield, Esq. re Ms. Nupson's demand to inspect trust records and related documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1116	2014/07/03 Larry P. Laubach email to John S. Middleton and Bruce Rosenfield re discussion	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate	6, 7, 8

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	with Arthur Solmssen (counsel for Ms. Hughes) about Ms. Nupson's demand to inspect trust records and other documents		Trust; John individually		counsel; litigation threatened by beneficiary.	
1117	2014/07/11 Larry P. Laubach email to John Middleton, Bruce Rosenfield and Margaret Thompson re research memorandum(attached, listed below) regarding demands of Thomas Mucci as counsel for Ms. Nupson to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1118	2014/07/11 Emily B. Pickering memorandum, attached to email listed above, to Margaret Thompson and Larry Laubach (all of Cozen) regarding "Inspection of Trust and Related Documents" in the possession of Cozen O'Connor, P.C. Electronic file named	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8

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	“19471519 6.pdf”					
1119	2014/07/17 Larry P. Laubach email to John Middleton and Bruce Rosenfield re attached draft response (listed below) to Thomas Mucci re Ms. Nupson’s demands to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1120	2014/07/17 Larry Laubach draft letter to Thomas Mucci, for review/comment by John Middleton, Bruce Rosenfield re Ms. Nupson’s demands to inspect trust records and other documents, attached to email listed above. Electronic file named “LEGAL 19579012v1 Letter to Thomas J. Budd Mucci, Esquire.DOCX”	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1121	2014/07/17 John S. Middleton email to Larry P. Laubach and Bruce Rosenfield re draft response to Thomas Mucci re Ms.	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened	6, 7, 8

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	Nupson's demands to inspect trust records and other documents				by beneficiary.	
1122	2014/07/17 John S. Middleton email to Larry P. Laubach and Bruce Rosenfield re draft response to Thomas Mucci re Ms. Nupson's demands to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1123	2014/07/17 Larry P. Laubach email to John S. Middleton and Bruce Rosenfield re draft response to Thomas Mucci re Ms. Nupson's demands to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1124	2014/07/17 John S. Middleton email to Larry P. Laubach and Bruce Rosenfield re draft response to Thomas Mucci re Ms. Nupson's demands to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1125	2014/07/17 John S.	A/C and WP	John as Trustee of the 1972,	Yes	Interests of John as trustee	6, 7, 8

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	Middleton email to Bruce Rosenfield; Larry P. Laubach re draft response to Thomas Mucci re Ms. Nupson's demands to inspect trust records and other documents		May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually		differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	
1126	2014/07/17 Larry P. Laubach email to John S. Middleton; Bruce Rosenfield re Ms. Nupson's demand to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1140	2014/05/29 Michael S. Williams Memorandum (attached to email listed above) to Nadine Doolittle, Wilbur Kipnes and Bruce Rosenfield (all from Schnader) re "Validity of Anna Nupson's 1998 Assignment." Electronic file named "4931963 1.pdf"	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	None
1146	2014/10/29 Larry P. Laubach email to John S. Middleton and Margaret Thompson re discussions with Thomas Mucci and	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened	6, 7, 8

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	Joel Young regarding Ms. Nupson's demands relating to the insurance trusts and the 1994 Anna Trust and 10/28/14 email from Mr. Young				by beneficiary.	
1147	2014/10/29 Larry P. Laubach email to John Middleton and Margaret Thompson re discussions with Thomas Mucci and Joel Young regarding Ms. Nupson's demands relating to the insurance trusts and the 1994 Anna Trust and 10/28/14 email from Mr. Young	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interest of beneficiary who was represented by separate counsel; litigation threatened by beneficiary.	6, 7, 8
1157	2014/11/10 Bruce Rosenfield email to James Mannion and John S. Middleton; Larry P. Laubach; Nadine Doolittle (Schnader) re Ms. Nupson's litigation relating to the three insurance trusts and the 1994 Anna Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1158	2014/11/10 Bruce Rosenfield email to James	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990	Yes	Relates to then-active litigation; trustee and	6, 7, 8

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	Mannion and John S. Middleton; Larry P. Laubach; Nadine Doolittle (Schnader) re Ms. Nupson's litigation relating to the three insurance trusts and the 1994 Anna Trust		insurance trusts; John individually and as Trustee of the 1994 Anna Trust		beneficiary's interests adverse.	
1166	2014/12/02 Margaret Thompson email to John S. Middleton and Larry P. Laubach; James Mannion re accounts for the 1994 Anna Trusts, with three attachments listed below	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1167	2014/12/02 Margaret Thompson draft fbo Hughes account document. Electronic file named "LEGAL 21654519v1 Anna Bauer Trust fbo Hughes Account.PDF"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1168	2014/12/02 Margaret Thompson draft fbo Middleton account document. Electronic file named "LEGAL 21653833v1 Anna Bauer Trust fbo Middleton Second	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8

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	Account.PDF”					
1169	2014/12/02 Margaret draft document for accounting of 1994 Anna Trusts. Electronic file named “LEGAL 21655089v1 Anna Trust Verifications.PDF”	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary’s interests adverse.	8
1170	2014/12/02 Margaret Thompson email to John S. Middleton and Larry P. Laubach; James Mannion re accounts for the 1994 Anna Trusts	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary’s interests adverse.	8
1171	2014/12/05 John Stine (Grant Thornton) email to Michael Kelly (Bradford), Larry P. Laubach and John S. Middleton re Ms. Nupson’s demands and litigation to inspect trust record and related documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary’s interests adverse.	8
1172	2014/12/09 Margaret Thompson email to John S. Middleton and James Mannion; Larry P. Laubach re potential resignation and replacement as Trustee of	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary’s interests adverse.	8

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	the 1994 Anna Trust and pending litigation					
1173	2014/12/09 Margaret Thompson email to John S. Middleton and James Mannion; Larry P. Laubach re potential resignation and replacement as Trustee of the 1994 Anna Trust and pending litigation	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1174	2014/12/09 Margaret Thompson email to John S. Middleton and James Mannion; Larry P. Laubach re draft Petitions for Adjudication of accounting for 1994 Anna Trust, with three attachments listed below.	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1175	2014/12/09 Margaret Thompson draft for review/comment. Electronic file named "LEGAL 21695808v1 Anna Middleton Bauer Trust fbo Hughes - Petition for Adjudication for Second Account.pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8

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1176	2014/12/09 Margaret Thompson draft for review/comment. Electronic file named "LEGAL 21705402v1 Anna Middleton Bauer Trust fbo Middleton - Petition for Adjudication for Second Account.pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1177	2014/12/09 Margaret Thompson draft for review/comment. Electronic file named "LEGAL 21708044v1 SIGNATURE PAGES Anna Trusts.PDF"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1178	2014/12/09 James Mannion email to John S. Middleton and Larry P. Laubach; Margaret Thompson re court hearing on Ms. Nupson's Petition for Declaratory Relief in May 1982 Insurance Trust	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8
1179	2015/01/13 Margaret Thompson email to James Mannion; Larry P. Laubach; John S. Middleton re communication from Joel	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John individually and as Trustee of the 1994 Anna Trust	Yes	Relates to then-active litigation; trustee and beneficiary's interests adverse.	8

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	Young relating to filing in Docket 2012-X3503					
1180	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1190	2002/03/29 Larry P. Laubach email to Robert Siwicki, Patrick Hurley, Daniel Williams, James E. Reilly (all of Fleet) and John S. Middleton and Annette Madison re revised confidentiality agreement	A/C	Bradford	No	N/A	1, 8
1193	2001/03/26 John S. Middleton email to John Stine (E&Y); Bruce Rosenfield; Larry Laubach re S-Corp reorganization and shareholder elections	A/C	Bradford; John individually and as Trustee of the 1994 Anna Trust	Yes only as to portion about Ms. Nupson, which has been produced.	As part of the meet and confer in the Orphans' Court Litigation, a version containing all information about the 1994 Anna Trust was produced; only information about other shareholders (for example, Mr. Middleton himself) was redacted.	8
1194	2001/03/26 John Stine email to John S. Middleton; Bruce Rosenfield, Larry Laubach, and Katherine Bruckman (of E&Y) re S-Corp reorganization and shareholder elections	A/C	Bradford; John individually and as Trustee of the 1994 Anna Trust	Yes only as to portion about Ms. Nupson, which has been produced.	As part of the meet and confer in the Orphans' Court Litigation, a version containing all information about the 1994 Anna Trust was produced; only information about other shareholders (for example, Mr. Middleton) was redacted.	8

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1203	2001/10/31 John Stine email to Larry Laubach, Bruce Rosenfield, John S. Middleton regarding legal and tax issues relating to possible amendment to shareholders agreement	A/C	Bradford; John individually	No	N/A	8
1204	2002/01/17 – Larry Laubach mark-up of Confidentiality Agreement with Fleet Securities	A/C	Bradford	No	N/A	1, 8
1205	2002/01/17 – Larry Laubach mark-up of Fleet engagement letter with Schnader. Electronic file named “ENGAGEMENT LETTER (Marked).doc”	A/C	Bradford	No	N/A	1, 8
1206	2002/01/17 – Larry Laubach mark-up of Fleet engagement letter with Bradford for Built-In Gains valuation relating to S-Corp conversion. Electronic file named “EXPANDED ENGAGEMENT LETTER (Marked).doc”	A/C	Bradford	No	N/A	1, 8
1210	2002/02/15 Larry P. Laubach email to Robert	A/C	Bradford	No	N/A	1, 8

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	Siwicki, Andrea Falcione (both of Fleet), John Middleton and Annette Madison re confidentiality agreement					
1211	2001/08/31 - Bradford Letter agreement with Fleet Advisors regarding access to confidential Bradford information in connection with engagement by Bruce Rosenfield/Schnader as counsel for Bradford to provide services to assist counsel in advising client	A/C	Bradford	No	N/A	1, 8
1214	2002/03/14 Larry P. Laubach email to Robert Siwicki (Fleet), John Middleton and Annette Madison re confidentiality agreement	A/C	Bradford	No	N/A	1, 8
1215	2002/03/14 – draft confidentiality agreement between Bradford and Fleet Securities. Electronic file named “YB\$PDOC.DOC”	A/C	Bradford	No	N/A	1, 8
1219	2002/03/29 Larry P. Laubach email to Robert	A/C	Bradford	No	N/A	1, 8

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	Siwicki, Patrick Hurley (Fleet), Daniel Williams (Fleet), James E. Reilly (Fleet), John Middleton and Annette Madison re revised confidentiality agreement					
1220	2002/04/01 Larry P. Laubach email to Robert Siwicki, Patrick Hurley (Fleet), Daniel Williams (Fleet), James E. Reilly (Fleet), John Middleton and Annette Madison re revised confidentiality agreement, with attachment listed below	A/C	Bradford	No	N/A	1, 8
1221	2002/04/01 Larry Laubach draft confidentiality agreement with Fleet for review/comment by recipients of email listed above. Electronic file named "YBMDDOC .doc"	A/C	Bradford	No	N/A	1, 8
1237	2001/03/29 Bruce Rosenfield email to John Middleton re QSST or ESBT election for November 1982 trust and Anna 1994 Trust	A/C	John individually and as trustee of November 1982 Trust	No	N/A	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
1238	2001/03/29 Larry P. Laubach email to John Middleton, Annette Madison (Bradford) and Bruce Rosenfield re E&Y request to lift restriction on ability of E&Y staff member providing services to other tobacco companies	A/C	Bradford; JMI (now owned by Philip Morris USA, Inc.	No	N/A	8
1242	2001/02/22 Marianna Marchiano (Schnader) email to John Stine (E&Y), John S. Middleton Bruce Rosenfield and Larry P. Laubach re stock purchase agreements with Susan Thorkelson and Nancy Smith (listed below)	A/C	Bradford	No	N/A	8
1243	2001/02/22 Marianna Marchiano draft for review/comment by John Middleton, Larry Laubach and Bruce Rosenfield, attached to email above. Electronic file named "bradford - stock purchase agreement of susan flood thorkelson v1.WPD"	A/C	Bradford	No	N/A	8

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1244	2001/02/22 Marianna Marchiano draft for review/comment by John Middleton, Larry Laubach and Bruce Rosenfield, attached to email above. Electronic file named “bradford - stock purchase agreement of nancy f. smith (2).WPD”	A/C	Bradford	No	N/A	8
1245	2001/02/22 Marianna Marchiano draft for review/comment by John Middleton, Larry Laubach and Bruce Rosenfield, attached to email above. Electronic file named “bradford - stock purchase agreement of susan f. thorkelson vRED (3).WPD”	A/C	Bradford	No	N/A	8
1248	2009/03/31 Larry P. Laubach email to John Middleton re potential conversion of 1994 Anna Trust to Unitrust and discussions with Ms. Nupson, Ms. Hughes and their respective counsel re	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None

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	same					
1249	2009/09/14 John S. Middleton email to Larry P. Laubach re Ms. Nupson's demands to modify the 1994 Anna Trust and proposed revisions to trust document	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
1250	2009/09/14 Larry P. Laubach email to John Middleton re Ms. Nupson's demands to modify the 1994 Anna Trust and proposed revisions to trust document	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
1251	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1253	2014/06/10 Bruce Rosenfield email to Larry P. Laubach and John S. Middleton re revised letter to Thomas Mucci in response to Ms. Nupson's demands relating to the three insurance trusts, the 1994 Anna Trust and her assignment	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Relates to threatened litigation with beneficiary.	8
1254	2014/06/10 Larry P. Laubach email to Bruce Rosenfield and John S. Middleton re discussions	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate	8

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	with Thomas Mucci about demands of Ms. Nupson relating to assignment of insurance trust distributions to 1994 Anna Trust		Trust; John individually		counsel. Relates to threatened litigation with beneficiary.	
1255	2014/07/17 Bruce Rosenfield email to John S. Middleton; Larry P. Laubach re draft response to Thomas Mucci re Ms. Nupson's demands to inspect trust records and other documents	A/C and WP	John as Trustee of the 1972, May 1982 and April 1990 insurance trusts; John as Trustee of the 1994 Anna Trust; John individually	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel. Relates to threatened litigation with beneficiary.	8
1257	2009/01/07 John S. Middleton email to Larry P. Laubach re negotiations with Ms. Hughes, Ms. Nupson and their respective attorneys regarding potential modifications to the 1994 Anna Trust	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John as trustee differed from interests of beneficiaries who were represented by separate counsel.	None
1258	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1259						
1260						
1263						
1265						
1273						

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1274	2015/09/10 Margaret Thompson email to James Mannion and John S. Middleton re three insurance trusts, 1994 Anna Trust, 1998 Revocable Trust and Marital Trust, and Ms. Nupson's demands relating to same, with attachment listed below	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.; John as former Trustee of the Modified 2001 GRAT	Yes	Interests of John adverse to beneficiary; litigation was pending.	2, 3, 8
1275	2015/08/24 Cozen O'Connor invoices, attached to email above, for services provided in connection with litigation commenced by Ms. Nupson	A/C and WP	John individually, and as Trustee of the 1972 and May 1982 Insurance Trusts, the 1994 Anna Trust, and the 1998 Revocable Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	2, 3, 8
1276	2014/01/10 John S. Middleton email to Margaret Thompson re communication from Ms. Nupson's attorney with demands relating to 1998 Revocable Trust	A/C and WP	John as Executor of the Estate of Frances S. Middleton and Trustee of the 1998 Revocable Trust	No	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	2, 3, 8
1277	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1278						
1279	2009/01/30 John Stine email to John S. Middleton; Larry P. Laubach and William	A/C	John as Trustee of the 1994 Anna Trust as to paragraph 1	Yes	As part of the meet and confer in the Orphans' Court Litigation, a version containing	

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	Marx (Smart & Associates) re Notes re conversations		John individually and/or Bradford as to numbered paragraphs 2 to 5	No – relates to company matters in post-redemption period	all information about the 1994 Anna Trust was produced; only information relating to the corporation's privilege was redacted.	
1280	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1281						
1282	2014/04/07 Bruce Rosenfield email to Larry P. Laubach and Margaret Thompson, Wilbur Kipnes (Schnader) re Ms. Nupson's demands relating to trust records and revocation of her assignment	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 7, 8
1283	2014/08/27 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Margaret Thompson, Larry P. Laubach and Nadine Doolittle re Ms. Nupson's demands related to trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1284	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1285	2008/12/18 Larry P. Laubach email to Bruce	A/C	John individually	No	N/A	8

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	Rosenfield and Roy Ross re personal matters for John Middleton					
1286	This document was produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1287	2014/02/17 Wilbur Kipnes (Schnader) email to Wilbur Kipnes (Schnader), Larry P. Laubach, Margaret Thompson , Bruce Rosenfield, and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1288	2014/02/14 Wilbur Kipnes (Schnader) emails with Margaret Thompson, Larry P. Laubach, Bruce Rosenfield and Nadine Doolittle (Schnader) re Ms. Nupson's demands relating to the 1994 Anna Trust and 2/12/14 letter to Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1289	2014/02/14 Margaret Thompson emails to Wilbur Kipnes (Schnader), Larry P.	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Laubach, Bruce Rosenfield and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 2/12/14 letter to Thomas Mucci		Trusts and 1994 Anna Trust			
1290	2014/02/13 Wilbur Kipnes (Schnader) emails with Larry P. Laubach, Margaret Thompson, Bruce Rosenfield and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 2/12/14 letter to Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1291	2014/01/21 Rosemary Maher (Schnader) emails with Margaret Thompson, Larry P. Laubach, Nadine Doolittle and Bruce Rosenfield re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1292	2014/01/20 Bruce Rosenfield emails with	A/C and WP	John individually, and as Trustee of the 1972, May 1982	Yes	Interests of John adverse to beneficiary; litigation	6, 8

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	Margaret Thompson, Larry P. Laubach, Rosemary Maher (Schnader), and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci		and April 1990 Insurance Trusts and 1994 Anna Trust		threatened by beneficiary.	
1293	2014/01/20 Margaret Thompson emails with Bruce Rosenfield, Larry P. Laubach, Rosemary Maher (Schnader), and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1294	2014/01/20 Bruce Rosenfield emails with Margaret Thompson, Larry P. Laubach, Rosemary Maher (Schnader) and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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1295	2014/01/20 Margaret Thompson emails with Bruce Rosenfield, Larry P. Laubach, Rosemary Maher (Schnader), and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1296	2014/01/20 Bruce Rosenfield emails with Larry P. Laubach, Margaret Thompson, Rosemary Maher (Schnader) and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1297	2014/01/19 Margaret Thompson emails with Bruce Rosenfield, Larry P. Laubach, Rosemary Maher (Schnader) and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	1/14/14 communications with Thomas Mucci					
1298	2014/01/18 Bruce Rosenfield emails with Margaret, Larry P. Laubach, Rosemary Maher (Schnader) and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1299	2014/01/18 Bruce Rosenfield emails with Margaret Thompson, Larry P. Laubach and Rosemary Maher (Schnader) re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1300	2014/01/18 Larry P. Laubach emails with Margaret Thompson, and Bruce Rosenfield re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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1301	2014/01/17 Bruce Rosenfield emails with Margaret Thompson and Larry P. Laubach re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1302	2014/01/16 Bruce Rosenfield emails with Larry P. Laubach and Margaret Thompson re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1303	2014/02/20 Larry P. Laubach email to Wilbur Kipnes (Schnader), Margaret Thompson, Bruce Rosenfield and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1304	2014/02/17 Larry P. Laubach email to Wilbur Kipnes (Schnader), Margaret Thompson, Bruce	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Rosenfield and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust					
1305	2014/02/13 Larry P. Laubach email to Margaret Thompson, Wilbur Kipnes, Bruce Rosenfield and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 2/12/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1306	2014/01/20 Larry P. Laubach email to Margaret Thompson, Bruce Rosenfield, Rosemary Maher (Schnader), and Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 2/12/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1307	2014/01/20 Larry P. Laubach email to Bruce Rosenfield, Margaret Thompson, Rosemary Maher (Schnader), and	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Nadine Doolittle re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci					
1308	2014/01/17 Larry P. Laubach email to Margaret Thompson and Bruce Rosenfield re Ms. Nupson's demands relating to the 1994 Anna Trust and 1/14/14 communications with Thomas Mucci	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1309	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1310						
1311						
1312	2014/04/11 Larry P. Laubach email to Bruce Rosenfield, Margaret Thompson and Wilbur Kipnes (Schnader) re Ms. Nupson's demands for trust records	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 7, 8
1313	2014/04/11 Larry P. Laubach email to Wilbur Kipnes (Schnader), Bruce Rosenfield and Margaret Thompson re Ms. Nupson's	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 7, 8

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	demands for trust records					
1314	1993/11/24 - 1997/07/08 - Collection of privileged communications by Herbert H. Middleton, Jr. with counsel (Bruce Rosenfield and Albert Momjian of Schnader) regarding personal representation of Herbert H. Middleton, Jr.. Electronic file named "LEGAL 18486430v1 Middleton Schnader HHM.PDF"	A/C and WP	John as Executor of the Estate of Herbert H. Middleton, Jr.	No – Although the documents mention the 1994 Anna Trust, they relate to Schnader’s representation of Herbert H. Middleton Jr., individually	N/A	4, 8
1315	2014/04/11 Larry P. Laubach email to Bruce Rosenfield, Wilbur Kipnes (Schnader), Margaret Thompson and Nadine Doolittle (Schnader) re Ms. Nupson’s demands for trust records, and Bradford confidentiality agreement	A/C and WP	Bradford; John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1316	2014/04/11 Larry P. Laubach email to Bruce Rosenfield, Wilbur Kipnes (Schnader), Margaret Thompson and Nadine	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Doolittle (Schnader) re Ms. Nupson's demands for trust records, and Bradford confidentiality agreement					
1317	2014/04/15 Larry P. Laubach email to Bruce Rosenfield, Wilbur Kipnes (Schnader), Margaret Thompson, and Nadine Doolittle (Schnader) re Ms. Nupson's demands for trust records, and Bradford confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1318	2014/04/15 Larry P. Laubach email to Bruce Rosenfield, Wilbur Kipnes (Schnader), Margaret Thompson and Nadine Doolittle (Schnader) re Ms. Nupson's demands for trust records, and Bradford confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1319	2014/06/03 Larry P. Laubach email to Bruce Rosenfield re Ms. Nupson's position regarding revocation of assignment	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1320	2014/06/10 Larry P.	A/C and WP	John individually, and as	Yes	Interests of John adverse to	6, 8

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	Laubach email to Nadine Doolittle and Bruce Rosenfield (both of Schnader) re Ms. Nupson's demands for trust records		Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust		beneficiary; litigation threatened by beneficiary.	
1321	2014/06/24 Wilbur Kipnes (Schnader) email to Larry P. Laubach and Bruce Rosenfield re Ms. Nupson's demands for trust records	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1322	2014/07/16 Wilbur Kipnes (Schnader) email to Larry P. Laubach and Bruce Rosenfield re Ms. Nupson's demands for trust records	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1323	2014/07/16 Bruce Rosenfield email to Larry P. Laubach and Wilbur Kipnes (Schnader) re Ms. Nupson's demands for trust records	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1324	2014/08/25 Bruce Rosenfield email to Larry P. Laubach and Wilbur Kipnes (Schnader); Nadine Doolittle re attached memorandum (listed below) regarding Ms. Nupson's demands regarding trusts of	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	which she is a beneficiary					
1325	2014/08/7 Nadine Doolittle Memorandum regarding Ms. Nupson's demands regarding trusts of which she is a beneficiary. Electronic file named "Memo to File.pdf"	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1326	2014/08/26 Larry P. Laubach email to Bruce Rosenfield, Wilbur Kipnes (Schnader), Nadine Doolittle and Margaret Thompson re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1327	2014/08/26 Margaret Thompson email to Larry P. Laubach, Bruce Rosenfield, Wilbur Kipnes (Schnader) and Nadine Doolittle re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1328	2014/08/26 Bruce Rosenfield email to Larry P. Laubach, Wilbur Kipnes (Schnader), Nadine	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Doolittle, Margaret Thompson and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary		Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.			
1329	2014/08/26 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach, Nadine Doolittle, Margaret Thompson and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1330	2014/08/26 Bruce Rosenfield email to Larry P. Laubach, Wilbur Kipnes (Schnader), Nadine Doolittle, Margaret Thompson and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1331	2014/08/26 Wilbur Kipnes (Schnader) email to Larry P. Laubach, Bruce Rosenfield,	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	Margaret Thompson and Nadine Doolittle re Ms. Nupson's demands regarding trusts of which she is a beneficiary		Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.			
1332	2014/08/26 Bruce Rosenfield email to Margaret Thompson, Larry P. Laubach, Wilbur Kipnes (Schnader), and Nadine Doolittle re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1333	2014/08/27 Bruce Rosenfield email to Margaret Thompson, Larry P. Laubach, Wilbur Kipnes (Schnader), Nadine Doolittle and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1334	2014/08/27 Wilbur Kipnes (Schnader) email to Margaret Thompson, Larry P. Laubach, Bruce Rosenfield, Nadine Doolittle and Rosemary Maher	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	(Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary		Herbert H. Middleton, Jr.			
1335	2014/08/27 Margaret Thompson email to Bruce Rosenfield, Larry P. Laubach, Wilbur Kipnes (Schnader), Nadine Doolittle and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1336	2014/08/27 Larry P. Laubach email to Bruce Rosenfield, Margaret Thompson, Wilbur Kipnes (Schnader), Nadine Doolittle and Rosemary Maher (Schnader) re Ms. Nupson's demands regarding trusts of which she is a beneficiary	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1337	2014/10/05 Bruce Rosenfield email to Margaret Thompson and Larry P. Laubach re communications from Thomas Mucci regarding Ms. Nupson's demands for	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	trust records and her position about the revocation of her assignment					
1338	2014/10/05 Larry P. Laubach email to Bruce Rosenfield and Margaret Thompson re communications from Thomas Mucci regarding Ms. Nupson's demands for trust records and her position about the revocation of her assignment	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1339	2014/10/05 Bruce Rosenfield email to Larry P. Laubach, Margaret Thompson, and Wilbur Kipnes (Schnader) re communications from Thomas Mucci regarding Ms. Nupson's demands for trust records and her position about the revocation of her assignment	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1340	2014/10/06 Larry P. Laubach email to Bruce Rosenfield, Margaret Thompson, Wilbur Kipnes	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	(Schnader) and Nadine Doolittle re Ms. Nupson's demands for trust records and her position about the revocation of her assignment		1994 Anna Trust			
1341	2014/10/29 Margaret Thompson (Cozen) email to Nancy Pole, Nadine Doolittle, Zach Zacharia, Bruce Rosenfield (all of Schnader) and Larry Laubach re Ms. Nupson's demands for distribution from insurance trusts and her position about the revocation of her assignment, and potential accountings for May 1982 trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1342	2014/10/29 Wilbur Kipnes (Schnader) email to Larry P. Laubach, Bruce Rosenfield, Margaret Thompson and Nadine Doolittle re communications with Thomas Mucci re Ms. Nupson's demands for distribution from May 1982	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

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	insurance trust					
1343	2014/10/29 Larry P. Laubach email to Wilbur Kipnes, Bruce Rosenfield (both Schnader) and Margaret Thompson (Cozen) re communications with Thomas Mucci re Ms. Nupson's demands for distribution from May 1982 insurance trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1344	2014/10/29 Bruce Rosenfield email to Larry P. Laubach, Wilbur Kipnes (Schnader), Margaret Thompson and Nadine Doolittle re communications with Thomas Mucci re Ms. Nupson's demands for distribution from May 1982 insurance trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1345	2014/10/30 Nancy Pole (Schnader) email to Margaret Thompson (Cozen), Zach Zacharia, Nadine Doolittle, Bruce Rosenfield (all Schnader) and Larry Laubach re Ms.	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

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	Nupson's demands for distribution from insurance trusts and her position about the revocation of her assignment, and potential accountings for May 1982 trust					
1346	2014/10/31 Bruce Rosenfield email to Larry P. Laubach, Margaret Thompson and Nadine Doolittle re potential resignation of John and replacement as Trustee of the 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1347	2014/11/04 Larry P. Laubach email to Wilbur Kipnes (Schnader), Bruce Rosenfield and Nadine Doolittle re Ms. Nupson's demands for trust records and pending petition re same	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	6, 8
1348	2014/11/17 Nadine Doolittle email to Margaret Thompson, Larry P. Laubach, James Mannion and Bruce Rosenfield re Petition for Adjudication	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	relating to 1994 Anna Trusts, with five attachments listed below for review/comment by recipients					
1349	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Middleton - Explanation of Exhibit 1 to Second Account (20.pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1350	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Hughes - Explanation of Exhibit 1 to Second Account	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
	(2014).pdf'					
1351	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Middleton - Trustee Documents (2014).pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1352	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Hughes - Trustee Documents (2014).pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1353	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8

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	recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Middleton - Petition for Adjudication Re_ Second Account (.pdf"					
1354	2014/11/17 Nadine Doolittle draft document for Petition for Adjudication of 1994 Anna Trust, for review/comment by recipients of email listed above. Electronic file named "Nupson, Anna (Middleton) - 1994 Trust fbo Hughes - Petition for Adjudication Re_ Second Account (201.pdf"	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1355	2014/11/21 Margaret Thompson email to Nadine Doolittle, James Mannion, Bruce Rosenfield and Larry P. Laubach re strategy for responding to Ms. Nupson's Petition relating to May 1982 Trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1356	2001/03/27 Bruce	A/C	Bradford	No	N/A	8

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	Rosenfield email to Larry P. Laubach re regarding questions relating to potential combination of various JMI subsidiaries					
1357	2002/02/15 Robert Siwicki email to Larry P. Laubach, Andrea Falcione (both of Fleet), John Middleton and Annette Madison re confidentiality agreement	A/C	Bradford	No	N/A	1, 8
1358	2001/03/29 Larry P. Laubach email to Katherine Bruckman, John Stine (both of E&Y), Bruce Rosenfield, Jeffrey God (both of Schnader), Annette Madison (Bradford), Clint Price (JMI, and John Middleton relating to steps to merge certain JMI subsidiaries into the parent company or into one another, as part of S-Corp conversion of Bradford	A/C	Bradford; JMI (now owned by Philip Morris USA, Inc.	No	N/A	8
1359	2002/11/05 Larry P. Laubach email to Annette Madison (Bradford), Gregory Cunningham	A/C	Bradford	No	N/A.	None

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	(Cozen) regarding advice to corporation regarding payment of corporate dividends, with attachment listed below					
1360	2014/06/05 Bruce Rosenfield email to Larry P. Laubach and Nadine Doolittle re Ms. Nupson's position regarding revocation of assignment and her demands for distribution from May 1982 insurance trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, and as Trustee of the 1994 Anna Trust	Yes	Yes – litigation threatened by beneficiary.	8
1361	2014/06/10 Nadine Doolittle email to Larry Laubach and Bruce Rosenfield re Ms. Nupson's demands for trust records	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr.	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1362	2014/10/31 Margaret Thompson email to Bruce Rosenfield, Nadine Doolittle and Larry P. Laubach re potential resignation and replacement as trustee for the 1994 Anna Trust	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

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1363	2014/03/12 Wilbur Kipnes (Schnader) emails with Margaret Thompson, Larry P. Laubach, Bruce Rosenfield and Nadine Doolittle re discussions with Thomas Mucci regarding his demands on behalf of Ms. Nupson for information about the 1994 Anna Trust and 3/12/14 email from Mr. Mucci	A/C and WP	John individually, and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1364	2014/02/14 Wilbur Kipnes (Schnader) email to Margaret Thompson, Larry P. Laubach, Bruce Rosenfield and Nadine Doolittle re attached documents pulled for review in response to Ms. Nupson's demands	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, as Trustee of the 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr., and as Executor of the Estate of Herbert H. Middleton, Jr.	Yes – to the extent refers to trusts of which Ms. Nupson is a beneficiary No – to the extent relates to Schnader's representation of Herbert H. Middleton Jr.	Interests of John adverse to beneficiary; litigation threatened by beneficiary	6, 8
1365	2014/02/14 Various documents representing communications by Herbert H. Middleton, Jr., with attorneys at Schnader relating to the firm's	A/C	John as Executor of the Estate of Herbert H. Middleton, Jr.	No – Although the documents mention the 1994 Anna Trust, the relate to Schnader's representation of Herbert H. Middleton Jr., individually and Mr. Middleton was never a	N/A. However, if determined to be trust administration record then exception applies, as litigation was threatened by beneficiary	4, 8

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	representation of Herbert H. Middleton, Jr			trustee of that trust		
1366	2014/04/11 Bruce Rosenfield email to Larry P. Laubach, Margaret Thompson, and Wilbur Kipnes (Schnader) re response to Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1367	2014/04/11 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret Thompson re Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts, and Bradford's confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1368	2014/04/11 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret Thompson re Ms. Nupson's demands for trust records relating to the 1994 Anna	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Trust and other trusts, and Bradford's confidentiality agreement					
1369	2014/04/11 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret Thompson re Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts, and Bradford's confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1370	2014/04/15 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret Thompson and Nadine Doolittle re Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts, and Bradford's confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1371	2014/04/15 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	Thompson and Nadine Doolittle re Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts, and Bradford's confidentiality agreement		Anna Trust			
1372	2014/04/15 Wilbur Kipnes (Schnader) email to Bruce Rosenfield, Larry P. Laubach and Margaret Thompson and Nadine Doolittle re Ms. Nupson's demands for trust records relating to the 1994 Anna Trust and other trusts, and Bradford's confidentiality agreement	A/C and WP	Bradford, John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1373	2014/01/16 Bruce Rosenfield email to Larry P. Laubach and Margaret Thompson re communications with Thomas Mucci re Ms. Nupson's demands for information about the 1994 Anna Trust and the Estate of Frances S. Middleton, and	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts, as Trustee of the 1994 Anna Trust, 1998 Revocable Trust, and the Marital Trust Under the Will of Herbert H. Middleton, Jr., as Executor of the Estate of Herbert H. Middleton, Jr. and as Executor	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8

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	1/14/14 communications with Thomas Mucci		of the Estate of Frances S. Middleton			
1374	2014/02/20 Margaret Thompson email to Larry P. Laubach and Wilbur Kipnes, Bruce Rosenfield and Nadine Doolittle (all of Schnader) re communications with Thomas Mucci re Ms. Nupson's demands for information about the 1994 Anna Trust	A/C and WP	John individually, as Trustee of the 1994 Anna Trust, and as Executor of the Estate of Frances S. Middleton	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1375	2014/02/20 Wilbur Kipnes (Schnader) email to Margaret Thompson, Larry P. Laubach (both of Cozen), Bruce Rosenfield and Nadine Doolittle (Schnader) re Ms. Nupson's demands for information about the 1994 Anna Trust	A/C and WP	John individually, as Trustee of the 1994 Anna Trust, and as Executor of the Estate of Frances S. Middleton	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	6, 8
1376	2014/08/14 Nadine Doolittle email to Margaret Thompson, Larry P. Laubach and Bruce Rosenfield re draft accounts for 1994 Anna Trust with	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

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	two attachments, listed below					
1377	2014/08/14 draft accounting for Anna Trust fbo Hughes.pdf, attached to email above	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1378	2014/08/14 draft accounting for Anna Trust fbo Middleton.pdf, attached to email above	A/C	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1379	2014/10/31 Bruce Rosenfield email to Margaret Thompson, Nadine Doolittle and Larry P. Laubach re petition for adjudication of 1994 Anna Trust and John's potential resignation and replacement as Trustee of same	A/C and WP	John individually and as Trustee of the 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1380	2013/11/05 Margaret Thompson email to John Stine (Grant Thornton), Bruce Rosenfield, Larry Laubach, Nadine Doolittle (Schnader), and Nancy Pole (Schnader) re petition for adjudication re 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust; John as Executor of the Estate of Frances S. Middleton	Yes	Interests of John adverse to beneficiary; litigation was pending.	8

A. Bates Number/ Log Entry Number	B. Description of Redacted or Withheld Document	C. Privilege, with Description of Redacted Information, If Any	D. Holder of Privilege	E. Is the Redacted Portion or Withheld Document About the 1994 Anna Trusts, the 2001 Anna GRAT, or the Modified 2001 GRAT?	F. Additional Notes	G. Redacted or Withheld Information Is Responsive to What Subpoena Request?
1381	2013/10/22 Bruce Rosenfield email to Larry P. Laubach, John Stine (Grant Thornton), Margaret Thompson (Cozen), Nadine Doolittle (Schnader) and Nancy Pole (Schnader) re petition for adjudication re 1994 Anna Trust	A/C and WP	John individually and as Trustee of the 1994 Anna Trust; John as Executor of Estate of Frances S. Middleton	Yes	Interests of John adverse to beneficiary; litigation was pending.	8
1389	2014/10/29 Larry P. Laubach email to Wilbur Kipnes, Bruce Rosenfield, Nadine Doolittle (all of Schnader) and Margaret Thompson (Cozen) regarding communications with Thomas Mucci regarding Ms. Nupson's demands relating to three insurance trusts and revocation of assignment	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8
1390	2014/10/29 Wilbur Kipnes (Schnader) email to Larry P. Laubach, Bruce Rosenfield, Margaret Thompson and Nadine Doolittle re communications with Thomas Mucci regarding	A/C and WP	John individually, and as Trustee of the 1972, May 1982 and April 1990 Insurance Trusts and 1994 Anna Trust	Yes	Interests of John adverse to beneficiary; litigation threatened by beneficiary.	8

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	Ms. Nupson's demands for distribution from the May 1982 insurance trust					
1391	These documents were produced in unredacted form as part of the meet and confer process in the Orphans' Court Litigation					
1392						
1393						
1394						
1395						
1396						
1397						
1398	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00006155</i>	Blank Rome complied with Schnader's clawback demand when it was made in 2017. It no longer has possession, custody or control of these documents. Responsive to Request No. 8				
1399	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00006156</i>					
1400	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00006158</i>					
1401	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00006159</i>					
1402	<i>Subject to Schnader</i>					

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	<i>Harrison Segal & Lewis claw back request. Document SHSL_00006160</i>					
1403	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00009884</i>					
1404	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00009898</i>	Blank Rome complied with Schnader's clawback demand when it was made in 2017. It no longer has possession, custody or control of these documents. Responsive to Request No. 8				
1405	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00009936</i>					
1406	<i>Subject to Schnader Harrison Segal & Lewis claw back request. Document SHSL_00010474</i>					
1407	2005/04/27 Bruce Rosenfield letter to Frances Middleton re Revocable Trust amendments and terms of Mrs. Middleton's Will	A/C – FSM Executors	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – document relates to Frances S. Middleton's actions as settlor and her personal estate planning	N/A	3, 8
1408	2005/07/12 - Bruce Rosenfield letter to Frances	A/C - FSM Executors	John Middleton and Lucia Hughes as Executor and	No – document does not involve advice to Mrs. Middleton	N/A	3, 8

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	S. Middleton re (a) estate planning, including (b) gifting to her grandchildren; (c) actions as settlor of 1998 Revocable Trust; (d) gifting to 1990 Trust for which Mrs. Middleton's three children are beneficiaries; and (e) trusts under the Modified 2001 GRAT f/b/o Lucia Hughes and John Middleton		Executrix of the Estate of Frances S. Middleton	regarding actions as a Trustee of a trust for which Ms. Nupson is a beneficiary, but instead involves advice to Mrs. Middleton about her own estate planning and actions as a settlor		
1412	September 12, 2013 notes of J. Stine re telephone conference with M. Thompson (counsel for Frances S. Middleton) regarding Mrs. Middleton's estate planning (withheld from Production No. 31); communication with financial advisor necessary for counsel to provide legal advice to client	A/C – FSM Executors	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – document relates to advice about Frances S. Middleton's estate and planning prior to her death	N/A	3, 8
JSM-82-CO 00537 ²	2014/11/10 – 2014/11/11: Email chain between	Attorney-Client Privilege and/or Attorney Work	John S. Middleton, Individually, as Trustee of the	Yes	Interests of John as trustee differed from interests of	

² Blank Rome does not have copies of these documents and therefore has not identified them as responsive to any particular Subpoena Request.

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	Margaret Thompson, Esq., Wilbur Kipnes, Esq., Bruce Rosenfield, Esq., and Larry Laubach, Esq. regarding litigation redacted.	Product	Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust		beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00541-00543	2014/10/29: Email from Larry Laubach, Esq. to Margaret Thompson, Esq., Wilbur Kipnes, Esq., Bruce Rosenfield, Esq., Nadine Doolittle, Zach Zacharia, Esq., and Nancy Pole, Esq. regarding communication from opposing counsel and threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00545	2014/10/30: Email chain between Margaret Thompson, Esq., Wilbur Kipnes, Esq., Larry Laubach, Esq., Nancy Pole, Esq., Zach Zacharia, Esq., and Bruce Rosenfield, Esq. regarding threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among	

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					other things, the 1982 JMI Trust	
JSM-82-CO 00546	2014/10/29: Email chain between Margaret Thompson, Esq., Larry Laubach, Esq., Wilbur Kipnes, Esq., Bruce Rosenfield, Esq., Nadine Doolittle, Esq., Zach Zacharia, Esq., and Nancy Pole, Esq. regarding threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00551	2013/12/20: Email chain between Margaret Thompson, Esq., Bruce Rosenfield, Esq., and Nancy Pole, Esq. regarding threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00693-00695	2014/11/19 – 2014/12/03: Email chain between Margaret Thompson, Esq., Zach Zacharia, Esq., Nancy	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate	

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	Pole, Esq., Bruce Rosenfield, Esq., and Nadine Doolittle, Esq. regarding preparation and filing of the account and litigation redacted.				counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00696	2014/11/21: Email chain between Margaret Thompson, Esq., James F. Mannion, Esq., Nadine Doolittle, Esq., and Bruce Rosenfield, Esq. regarding preparation and filing of the account and litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00697	2014/11/19 – 2014/11/21: Email chain between Margaret Thompson, Esq., James F. Mannion, Esq., Nadine Doolittle, Esq., Bruce Rosenfield, Esq., and Larry Laubach, Esq. regarding preparation and filing of the account and litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	

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JSM-82-CO 00698-00699	2014/11/19: Email chain between Margaret Thompson, Esq., Zach Zacharia, Esq., Nancy Pole, Esq., Bruce Rosenfield, Esq., and Nadine Doolittle, Esq., with marginalia of Margaret Thompson, Esq., regarding preparation and filing of the account and litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00709	2014/10/29 – 2014/10/30: Email chain between Margaret Thompson, Esq., Nancy Pole, Esq., Nadine Doolittle, Esq., Zach Zacharia, Esq., Bruce Rosenfield, Esq., and Larry Laubach, Esq. regarding preparation and filing of the account and threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00711	2014/10/29: Email from Margaret Thompson, Esq. to Nancy Pole, Esq., Nadine Doolittle, Esq., Zach Zacharia, Esq., Bruce Rosenfield, Esq., and Larry	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the Anna 1994 Trust, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there	

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	Laubach, Esq. regarding preparation and filing of an account and threatened litigation redacted.				was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00712	2014/10/29: Email chain between Margaret Thompson, Esq., Nancy Pole, Esq., Nadine Doolittle, Esq., Zach Zacharia, Esq., Bruce Rosenfield, Esq., Wilbur Kipnes, Esq., and Larry Laubach, Esq. regarding preparation and filing of the account and threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the QTIP Marital Trust u/w/o Herbert H. Middleton, Jr., as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00726	2013/12/20: Email chain between Margaret Thompson, Esq., Bruce Rosenfield, Esq., and Nancy Pole, Esq. regarding threatened litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually, as Trustee of the 1994 Anna Trusts, as Trustee of the 1972 Trust, as Trustee of the 1982 JMI Trust, and as Trustee of the 1990 Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was threatened litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	

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JSM-82-CO 00774-00776	2014/11/19 – 2014/12/22: Email chain between Margaret Thompson, Esq., Zach Zacharia, Esq., Nancy Pole, Esq., Bruce Rosenfield, Esq., and Nadine Doolittle, Esq., with marginalia of Margaret Thompson, regarding preparation and filing of the account and litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00777-00779	2014/11/19 – 2014/11/24: Email chain between Margaret Thompson, Esq., Zach Zacharia, Esq., Nancy Pole, Esq., Bruce Rosenfield, Esq., and Nadine Doolittle, Esq., with marginalia of Margaret Thompson, regarding preparation and filing of the account and litigation redacted.	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
JSM-82-CO 00780-00782	2014/11/19 – 2014/11/22: Email chain between Margaret Thompson, Esq., Zach Zacharia, Esq., Nancy	Attorney-Client Privilege and/or Attorney Work Product	John S. Middleton, Individually and as Trustee of the 1982 JMI Trust	Yes	Interests of John as trustee differed from interests of beneficiary who was represented by separate	

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	Pole, Esq., Bruce Rosenfield, Esq., and Nadine Doolittle, Esq., with marginalia of Margaret Thompson, regarding preparation and filing of the account and litigation redacted.				counsel. At the time this document was created there was active litigation between John S. Middleton and Ms. Nupson regarding, among other things, the 1982 JMI Trust	
1/31/2017 Production ³	11/2007 - Bruce A. Rosenfield, Transmittal Slip for the File, with attachment from Fran Middleton	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – communication from Frances S. Middleton does not relate to a trust or to Frances Middleton’s estate	N/A	8
1/31/2017 Production	Undated, Schnader attorney’s handwritten notes re: 1990 Insurance Trust, 1982 Insurance Trust and November 18, 1982 Trust for the benefit of John S. Middleton, with attachments Undated, Schnader	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No	N/A	8

³ The entries on the “1/31/2017 Production” Privilege log were not collected into the Compiled Privilege Logs in the Orphans’ Court Litigation because Ms. Nupson did not previously challenge any entries contained thereon. Thus these particular entries did not, at that time, receive the same types of revision and elaboration as the other logs. For purposes of this Motion, Blank Rome has expanded upon (and at times corrected) the document descriptions and the identification of the holder(s) of any privilege. Though referred to at the time, and in the Subpoena attachment, as a production of “Schnader Hardcopy Documents,” as shown by the descriptions for the last documents this log also included some materials from the files of Cozen O’Connor, P.C.

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	attorney's handwritten notes regarding conversation with Frances S. Middleton					
1/31/2017 Production	11/29/2004, Schnader attorney's handwritten notes re: various McCabe trust accounts	AC	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton <i>and</i> John as Trustee of the Anna 1994 Trust, the 1982 Insurance Trust, the 1990 Insurance Trust, and various other Trusts for which Ms. Nupson is not a beneficiary	Yes as to information about the Anna 1994 Trust, no as to information about other Trusts.	N/A	8
1/31/2017 Production	1/18/2001, John Stine to Bruce Rosenfield, Fax transmission with attachment re: Middleton Trusts	AC	John, individually, as Trustee of 1994 Anna Trust, Marital Trust, 1994 GST Trust, and the November 18, 1982 Trust	Yes as to portions about 1994 Anna Trust and Marital Trust No as to portions about 1996 GST Trust and November 1982 Trusts	N/A	8
1/31/2017 Production	5/2/2005, Schnader attorney's handwritten notes re: conference with Bruce on John S. Middleton estate planning, Bradford Holdings, Inc. and Fran's 2001 GRAT	AC	Bradford; John individually; John, as Trustee of the 1994 Anna Trust; John as Trustee of the 2001 JSM Family Trust	Yes as to portions about 1994 Anna Trust, 2001 Anna Trust No as to portions about Bradford	N/A	8
	5/25/2001, Bruce A.	AC – FSM	John Middleton as Executor of	No – Ms. Nupson was not a	N/A	2, 3, 8

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1/31/2017 Production	Rosenfield to John S. Middleton and Larry Laubach, Letter re: Frances Middleton estate planning/2001 GRAT	Executors Hold	the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton <i>and</i> John as Trustee of the Original 2001 GRAT	beneficiary of the Original 2001 GRAT		
1/31/2017 Production	4/11/2002 through 2/28/2003, Transaction History for the account of John S. Middleton TTEE, FSM GRAT 2/1/01	A/C	John S. Middleton individually and as Trustee of the Original 2001 GRAT	No	Subject to confirmation, Blank Rome understand that the transaction history for the accounts for the Original 2001 GRAT were previously provided to Ms. Nupson in connection with her petitions for trust administration records in the Orphans' Court Litigation.	8
1/31/2017 Production	9/28/2000, Bruce Rosenfield to Roy Ross and Larry Laubach, Memorandum re: John/Fran Middleton	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No	N/A	2, 3, 8
1/31/2017 Production	8/13/2008, Margaret Thompson to Bruce Rosenfield, Email chain re: Fran Middleton	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No	N/A	8
1/31/2017	7/12/2005, Bruce Rosenfield to Frances Middleton, Letter	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S.	No	N/A	2, 3, 8

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Production	re: estate planning		Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton			
1/31/2017 Production	4/5/2002, Bruce Rosenfield to John Middleton, Email re: GRAT assignment	AC	John as Trustee of the Original 2001 GRAT	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	8
1/31/2017 Production	4/5/2002, Bruce Rosenfield to John Middleton, Email re: assignment for 2001 GRAT	AC	John as Trustee of the Original 2001 GRAT	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	8
1/31/2017 Production	3/21/2002, Bruce Rosenfield to John Stine, cc John Middleton, Email re: agenda for meeting on various issues	AC – FSM Executors Hold in part	John, individually, as Trustee of the Original 2001 GRAT, as Settlor of the 1996 Trust for his children, as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No —Ms. Nupson was not a beneficiary of the Original 2001 GRAT	Even if co-Executor consented, information regarding 1996 Trust settled by Mr. Middleton for his children would be withheld.	2, 3, 8
1/31/2017 Production	11/9/2001, Bruce Rosenfield to Frances S. Middleton, Letter re estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Frances Middleton’s estate planning rather than legal advice about a trust for which Ms. Nupson is or was a beneficiary	N/A	2, 3, 8
1/31/2017 Production	11/21/2001, Bruce Rosenfield to John Middleton, Letter re: GRAT of Frances	AC – FSM Executors Hold in part	John as Trustee of the Original 2001 GRAT and John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S.	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT.	N/A	2, 3, 8

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			Middleton			
1/31/2017 Production	8/28/2001, Bruce Rosenfield to Frances Middleton, cc John Middleton, Letter re: GRAT	AC – FSM Executors Hold in part	John as Trustee of the Original 2001 GRAT and John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Frances Middleton’s actions as settlor of the Original 2001 GRAT	N/A	2, 3, 8
1/31/2017 Production	6/28/2001, Bruce Rosenfield to Frances Middleton, cc John Middleton, Letter re estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Frances Middleton’s actions as settlor of the Original 2001 GRAT	N/A	2, 3, 8
1/31/2017 Production	6/22/2001, Annuity calculations for Original 2001 GRAT	AC – FSM Executors Hold in part	John as Trustee of the Original 2001 GRAT and John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Frances Middleton’s actions as settlor of the Original 2001 GRAT	N/A	2, 3, 8
1/31/2017 Production	8/11/1999, Bruce Rosenfield to File, Memorandum re Middleton accounts with financial advisors	AC – FSM Executors Hold in part	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton John as Trustee of the 1994 Anna Trust and the May 1982	Yes as to portions relating to the 1994 Anna Trust No as to all other portions	Even if co-Executor consented, personal information about Mr. Middleton and his wife would be withheld.	8

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			Trust, and as Executor of the Estate of Herbert H. Middleton, Jr. John and Leigh Middleton individually			
1/31/2017 Production	6/8/1999, Bruce Rosenfield to Nancy Pole, Memorandum re: various Middleton personal and trust financial accounts and Frances Middleton's estate planning	AC – FSM Executors Hold in part	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton John and Leigh Middleton individually, John as settlor of the 1996 GST Trust and Trustee of the November 1982 Trust, and John as Trustee of the January 1994 Trust John as Trustee of the April 1990 Insurance Trust and Executor of the Estate of Herbert H. Middleton, Jr.	No	Even if co-Executor consented, information regarding 1996 Trust settled by Mr. Middleton for his children would be withheld.	2, 3, 8
1/31/2017 Production	8/2/2001, Handwritten draft and typed final version of charts showing family tree of Frances Middleton with	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of	No – though document references trusts for which Ms. Nupson is a beneficiary, it relates to representation of Mrs.	N/A	2, 3, 8

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	stock owned by family members and current assets available for distribution net of any death taxes for estate planning of Mrs. Middleton		Frances S. Middleton	Middleton as part of her estate planning		
1/31/2017 Production	1999, Unexecuted Agreement of Trust between Frances S. Middleton as Grantor, and Frances S. Middleton and John S. Middleton as Trustees	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	2, 3, 8
1/31/2017 Production	4/8/2002; 6/4/2002; 9/9/2002; and 12/20/2002, Assignments executed by John S. Middleton re: distributions from Bradford Holdings, Inc., with attachments. Includes 12/2002 handwritten message from John S. Middleton to Bruce A. Rosenfield regarding draft assignments	AC	John as Trustee of the Original 2001 GRAT	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	8
1/31/2017 Production	4/25/2001, Schnader attorney's handwritten notes re: meeting on Frances Middleton estate planning	AC – FSM Executors Hold in part	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of	No	No	2, 3, 8

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			Frances S. Middleton			
1/31/2017 Production	1/24/2001, Bruce Rosenfield to John Stine, Email re: agenda for various issues, including estate planning for Frances Middleton	AC – FSM Executors Hold in part	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton Bradford in part	No – related to Frances S. Middleton’s estate planning and/or actions as settlor	N/A	2, 3, 8
1/31/2017 Production	Undated, Schnader document titled “Bradford Holdings Valuations” with recommendation to client	AC	Bradford	No	N/A	1, 8
1/31/2017 Production	Undated, Schnader document titled “Bradford Holdings Valuation as of April 19, 2000”	AC	Bradford	No	N/A	1, 8
1/31/2017 Production	3/10/1999, Bruce Rosenfield to Roy Ross, Email re: Middleton and GRAT for Fran, with attachments	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Frances S. Middleton’s estate planning	N/A	2, 3, 8
1/31/2017 Production	3/22/2002, Amy Newman to Bruce Rosenfield, Transmittal slip re: Middleton GRAT, <i>i.e.</i> , the	AC – FSM Executors Hold in part	John Middleton as Trustee of the Original 2001 GRAT; John Middleton as Executor of the Estate of Frances S. Middleton	No – Ms. Nupson was not a beneficiary of the Original 2001 GRAT	N/A	2, 3, 8

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	Original 2001 GRAT		and Lucia Hughes as Executrix of the Estate of Frances S. Middleton			
1/31/2017 Production	9/25/2000, Schnader document titled “Agenda – Fran Middleton”, with attachments	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – does not relate to a trust for which Ms. Nupson was a beneficiary; rather is about Mrs. Middleton’s estate planning.	N/A	2, 3, 8
1/31/2017 Production	Undated, Schnader handwritten document titled “Fran” regarding discussions with Frances S. Middleton	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to trusts, document is related to the estate planning of Frances S. Middleton rather than legal advice regarding any trustee’s duties to a trust	N/A	2, 3, 8
1/31/2017 Production	Undated, Schnader document titled “Frances Middleton – GRAT dated 2/1/01”, with attachments outlining family assets for Mrs. Middleton’s estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to trusts, document is related to the estate planning of Frances S. Middleton rather than legal advice regarding any trustee’s duties to a trust	N/A	2,3, 8
1/31/2017 Production	11/17/2001, Schnader handwritten document titled “Fran Middleton – Assets”, for Mrs. Middleton’s estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to trusts, document is related to the estate planning of Frances S. Middleton rather than legal advice regarding any trustee’s duties to a trust	N/A	2,3, 8
1/31/2017 Production	11/9/2001, Bruce Rosenfield to Herbert Middleton, Letter re estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes	No – relates to Frances Middleton’s estate planning rather than legal advice about a	N/A	2, 3, 8

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			as Executrix of the Estate of Frances S. Middleton	trust for which Ms. Nupson is or was a beneficiary		
1/31/2017 Production	Undated, Schnader draft document titled Frances S. Middleton GRAT Chart” for Mrs. Middleton’s gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Original 2001 GRAT	N/A	2,3, 8
1/31/2017 Production	10/9/2002, Schnader handwritten notes re: telephone call with Stephanie and RTC account for GRAT	AC – FSM Executors Hold in part	John Middleton as Trustee of the Original 2001 GRAT; John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – relates to Original 2001 GRAT	N/A	2,3, 8
1/31/2017 Production	3/2003, Amy Newman to Zach Zacharia, Transmittal Slip re: Middleton 709 for GRAT, with attached emails among Amy Newman, Jennifer Stoudt and Bruce Rosenfield regarding statutes of limitations and gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT and was written at time Ms. Nupson was beneficiary, relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	10/16/2002, Nancy Pole to Frank Orr, Re: filing of Mrs. Middleton’s gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No	N/A	8

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1/31/2017 Production	9/23/2002, Bruce Rosenfield to Nancy Pole; Frank Orr; cc to Roy Ross; Zach Zacharia, Email chain re Frances Middleton's gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	9/23/2002, Frank Orr to Roy S. Ross; cc to Bruce A. Rosenfield; Nancy Pole, Memorandum re: Frances Middleton Gift Tax Return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	9/23/2002, Bruce Rosenfield to Frank Orr, Email chain re: Frances Middleton gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	4/10/2002, Amy Newman to Frank Orr, Transmittal Slip re: info on GRAT of Frances Middleton, with attachments relating to Original 2001 GRAT for use in gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	8/6/2002, Nancy Pole to Frank Orr, Email chain re Frances Middleton gift tax	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and	N/A	8

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	return 4/2/2002, Nancy Pole to Frank Orr re: Frances Middleton gift tax return 2/18/2002, Roy Ross to Bruce Rosenfield, Frank Orr and Nancy Pole re: Frances Middleton gift tax return		as Executrix of the Estate of Frances S. Middleton	relates to representation of Frances S. Middleton in her capacity as settlor.		
1/31/2017 Production	4/2/2002, Nancy Pole to Frank Orr, Email chain re: Fran Middleton gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	2/2/2002, Roy Ross to Bruce Rosenfield; Frank Orr; Nancy Pole. Email re; Fran Middleton gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	4/2/2002, Nancy Pole to Frank Orr, Email chain re: Middleton GRAT for use in preparing Frances S. Middleton gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	Entry is a duplicate for same document two lines above.	8

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1/31/2017 Production	2/2/2002, Roy Ross to Frank Orr, cc Nancy Pole, Email chain re: gift tax list	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	Entry is a duplicate for same document two lines above	8
1/31/2017 Production	11/27/2001, Roy Ross to A. R. Zacharia, cc Bruce Rosenfield, Memorandum re GRAT, with attachment	AC – FSM Executors Hold in part	John Middleton as Trustee of the Original 2001 GRAT; John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	2/1/2001, Unexecuted Agreement of Trust between Frances S. Middleton as Grantor and John S. Middleton as Trustee	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – Ms. Nupson was not a beneficiary of this draft trust	N/A	8
1/31/2017 Production	3/16/1999, Schnader document re: Gift Tax/QPRT estate planning calculations for Frances S. Middleton	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	2, 3, 8
1/31/2017 Production	3/16/1999, Schnader document re: Gift Tax/QPRT estate planning calculations for Frances S.	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of	N/A	2, 3, 8

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	Middleton, and GRIT/Qualified Personal Residence Trust		Frances S. Middleton	Frances S. Middleton in her capacity as settlor.		
1/31/2017 Production	9/9/2002, Frank Orr to Roy Ross; Bruce Rosenfield, Email chain re Bradford information for Frances S. Middleton's gift tax return	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to the 2001 GRAT, Ms. Nupson was not a beneficiary at the time, and relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	Undated, Schnader handwritten notes re: family shares and GRAT	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No -- relates to representation of Frances S. Middleton in her capacity as settlor.	N/A	8
1/31/2017 Production	4/27/2005, Bruce Rosenfield to Frances Middleton, Letter re:Revocable Trust, with attachment	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though relates to Revocable Trust for which Ms. Nupson was a beneficiary, relates to representation to Frances S. Middleton in her capacity as settlor	N/A	2, 3, 8
1/31/2017 Production	7/8/2005, Schnader handwritten notes re: Fran Middleton regarding discussions with Mrs. Middleton about estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No	N/A	2, 3, 8
1/31/2017	3/25/2005, Bruce Rosenfield to File, cc Roy Ross,	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S.	Yes as to portions regarding Frances S. Middleton's service as	N/A	2, 3, 8

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Production	Memorandum re: Fran Middleton		Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	co-Trustee of the 1994 Anna Trust. No as to portions relating to Frances S. Middleton's general estate and gift planning		
1/31/2017 Production	7/28/1995, Herb Middleton to Bruce Rosenfield, Handwritten note re: Trust and renunciation	AC – HHM, Jr. Executor	John as Executor of the Estate of Herbert H. Middleton, Jr.	No – though refers to Ms. Nupson's renunciation, Herbert H. Middleton, Jr., was not trustee of that trust.	N/A	8
1/31/2017 Production	4/8/2002; 6/4/2002; 9/9/2002; and 12/20/2002, Assignments executed by John S. Middleton as Trustee of Original 2001 GRAT	AC	John as Trustee of the Original 2001 GRAT	No – Ms. Nupson was not a beneficiary at the time	N/A	8
1/31/2017 Production	9/6/2002, Rose Kennedy to Roy Ross, Transmittal Slip, with chart attached re: summary of current/future ownership of Bradford Holdings Inc. stock of Herbert H. Middleton, Jr. and Frances S. Middleton Family for estate planning binder	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8

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1/31/2017 Production	5/30/2001, Schnader chart with handwritten notes titled “Bradford Holdings, Inc. Class B Non-Voting Common Shares – Summary” for estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	7/31/2002, Schnader chart titled “Bradford Holdings Co. Summary of Ownership” for estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	12/31/2001, Schnader chart re: Bradford Holdings Inc. for estate planning	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	4/19/2000, Message Confirmation re: fax of document titled “Bradford Holdings Valuation as of April 19, 2000”	AC	Bradford	No	N/A	1, 8
1/31/2017 Production	6/28/2000, Larry Laubach to Robert M. Siwicki; cc to John Middleton; Bruce Rosenfield, Letter re: Bradford Holdings, Inc., with attachments	AC	Bradford	No	N/A	1, 8

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1/31/2017 Production	6/26/2008; 7/25/2008; 9/17/2008; and 12/9/2008, Letters from Cozen O'Connor to Frances Middleton c/o John Stine, enclosing Invoices for Professional Services related to estate planning (Bates Nos. CO 000629 – 641)	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	1/26/2009; 3/17/2009; 4/16/2009; 5/14/2009; 6/29/2009; 7/24/2009; 9/25/2009; 11/24/2009; and 12/15/2009, Letters from Cozen O'Connor to Frances Middleton c/o John Stine, enclosing Invoices for Professional Services related to estate planning (Bates Nos. CO 000642 – 677)	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	1/19/2010; 2/25/2010; 4/14/2010; 5/13/2010; 6/14/2010; 7/22/2010; 8/26/2010; 9/15/2010; 10/25/2010; 11/11/2010; and 12/6/2010, Letters from Cozen O'Connor to Frances	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8

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	Middleton c/o John Stine, enclosing Invoices for Professional Services related to estate planning (Bates Nos. CO 000678 – 720)					
1/31/2017 Production	1/26/2011; 3/16/2011; 4/20/2011; 5/26/2011; 6/10/2011; 7/26/2011; 8/15/2011; 9/21/2011; 10/24/2011; 11/15/2011; and 12/9/2011, Letters from Cozen O'Connor to Frances Middleton c/o John Stine, enclosing Invoices for Professional Services related to estate planning (Bates Nos. CO 000721 – 754)	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	1/13/2012; 2/21/2012; 4/16/2012; 5/23/2012; 6/20/2012; 7/23/2012; 8/23/2012; 9/27/2012; 10/18/2012; 11/15/2012; and 12/12/2012, Letters from Cozen O'Connor to Frances Middleton c/o John Stine, enclosing Invoices for Professional Services (Bates	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8

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	Nos. CO 000755 – 789)					
1/31/2017 Production	1/22/2013; 2/22/2013; 3/25/2013; 4/10/2013; 5/23/2013; 6/17/2013; 7/23/2013; 8/30/2013; 9/12/2013; and 11/12/2013, Letters from Cozen O'Connor to Frances Middleton c/o John Stine, enclosing Invoices for Professional Services related to estate planning (Bates Nos. CO 000790 – 827)	AC – FSM Executors Hold	John Middleton as Executor of the Estate of Frances S. Middleton and Lucia Hughes as Executrix of the Estate of Frances S. Middleton	No – though refers to various trusts, document relates to representation of Frances S. Middleton in connection with her estate planning	N/A	2, 3, 8
1/31/2017 Production	1/17/2014; 2/19/2014; 4/25/2014; 5/20/2014; 6/12/2014; and 12/3/2014, Letters from Cozen O'Connor to Frances Middleton Trust c/o John Stine, enclosing Invoices for Professional Services related to Frances Middleton Revocable Trust (Bates Nos. CO 000874 – 891)	AC	John as Executor of the Estate of Frances S. Middleton (not shared with Lucia Hughes)	??		2, 3, 8
1/31/2017 Production	10/7/2014 and 12/3/2014, Letters from Cozen O'Connor to Anna M. Bauer Trusts, John S.	AC	John as Executor of the Estate of Frances S. Middleton (not shared with Lucia Hughes)	??		2, 3, 8

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	Middleton Trustee, enclosing Invoices for Professional Services related to Anna 1994 Trusts (Bates Nos. CO 000914 – 919)					